

San Francisco Planning Department

185 POST STREET

Draft Environmental Impact Report

00.272E

Draft EIR Publication Date: May 12, 2001

Draft EIR Public Hearing Date: June 14, 2001

Draft EIR Public Comment Period: May 12-June 19, 2001

Written comments should be sent to:

**The Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103**

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TO: Distribution List for the 185 Post Street Project Draft EIR

FROM: Paul Maltzer, Environmental Review Officer

SUBJECT: Request for the Final Environmental Impact Report for the 185 Post Street Project
(Case No. 00.272E)

This is the Draft of the Environmental Impact Report (EIR) for the 185 Post Street project. A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, our office will prepare and publish a document titled "Summary of Comments and Responses" which will contain a summary of all relevant comments on this Draft EIR and our responses to those comments; it may also specify changes to this Draft EIR. Public agencies and members of the public who testify at the hearing on the Draft EIR will automatically receive a copy of the Comments and Responses document, along with notice of the date reserved for certification; others may receive such copies and notice on request or by visiting our office. This Draft EIR together with the Summary of Comments and Responses document will be considered by the Planning Commission in an advertised public meeting and certified as a Final EIR if deemed adequate.

After certification, we will modify the Draft EIR as specified by the Comments and Responses document and print both documents in a single publication called the Final Environmental Impact Report. The Final EIR will add no new information to the combination of the two documents except to reproduce the certification resolution. It will simply provide the information in one rather than two documents. Therefore, if you receive a copy of the Comments and Responses document in addition to this copy of the Draft EIR, you will technically have a copy of the Final EIR.

We are aware that many people who receive the Draft EIR and Summary of Comments and Responses have no interest in receiving virtually the same information after the EIR has been certified. To avoid expending money and paper needlessly, we would like to send copies of the Final EIR to private individuals only if they request them. If you would like a copy of the Final EIR, therefore, please fill out and mail the postcard provided inside the back cover to the Major Environmental Analysis Office of the Planning Department within two weeks after certification of the EIR. Any private party not requesting a Final EIR by that time will not be mailed a copy.

Thank you for your interest in this project.



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CHAPTER I

SUMMARY

A. PROJECT DESCRIPTION (p. 9)

The project site is one block east of Union Square in downtown San Francisco, at the southeast corner of Post Street and Grant Avenue. The 3,600-square-foot project site, situated within the Kearny-Market-Mason-Sutter Conservation District, is occupied by a vacant six-story-plus-basement structure that consists of approximately 15,400 square feet of retail space and 10,800 square feet of office space.

The project would consist of demolition of the existing 26,200-square-foot building and construction of a new ten-story-plus-basement, 130-foot tall building that would serve as the West Coast headquarters and retail store of the apparel company Prada USA. The new structure would contain approximately 39,300 square feet (sq. ft.), with part of the basement serving as storage and mechanical equipment space, display space and a reception area on the ground-floor, retail space on the second through fifth levels, open space on the sixth level, showroom space on the seventh level, office space on the eighth and ninth levels, and a private residential space on the top floor. In total, the project would provide approximately 4,400 sq. ft. of office space, 6,800 sq. ft. of retail space, 1,500 sq. ft. of showroom space, 1,700 sq. ft. of residential space, 2,250 sq. ft. of open space, and 22,650 sq. ft. of storage and other space. The proposed structure would be 42 feet taller than the 88-foot tall structure currently on the project site.

The building's façade, which would extend to the site's property lines, would be composed of stainless steel, stone, and glass. The matte-finished stainless steel structural skin, which would bear a substantial portion of the building's lateral load, would be articulated with circular windows and raised steel disks of varying size in a pattern that would express the floor slabs and grid of supporting steel beams and columns concealed by the facade.¹ The perforations would also allow diffused interior lighting and glimpses of interior building uses to be visible from outside the building.

The existing six-story-plus-basement building at 185 Post Street is constructed of steel and concrete. Built in 1908, but completely remodeled through numerous alterations beginning in 1951, it is a Category V (Unrated) Building (Building not Significant or Contributory) within the Kearny-Market-Mason-Sutter Conservation District and was rated "D" (Minor or No Importance) by San Francisco Architectural Heritage.

¹ Only the two publicly visible elevations, those facing Post Street and Grant Avenue, would be clad with the articulated stainless steel skin. As such, subsequent references in this document to the articulated facade of the proposed building refer only to the two publicly visible elevations.

The project's floor area ratio (FAR) would be 8.7:1, which exceeds the basic permitted FAR in the C-3-R District (without transfer of development rights to the site) of 6:1. However, the project would be within the allowable maximum FAR of 9:1 with the transfer of development rights. Because the project site is located within the 80-130-F Height and Bulk District, the proposed project would require an exception to exceed 80 feet in height. The existing site does not have parking or a loading dock, and no parking or loading accommodations would be provided as part of the project.

Project construction, including demolition of the existing building, would take approximately 16 to 19 months, with opening of the proposed building planned for fall 2002. The project architects are Rem Koolhaas of the Office for Metropolitan Architecture in Rotterdam, The Netherlands, and Brand + Allen Architects of San Francisco.

B. ENVIRONMENTAL EFFECTS

This environmental impact report, for the 185 Post Street project, focuses on the issues of historic architectural resources and visual quality. The historic architectural resource issue relates to the proposed construction of a ten-story stainless steel structure within the Kearny-Market-Mason-Sutter Conservation District. The visual quality issue, which is closely related to the historic architectural resources issue, is based on the proposal to construct an architecturally distinctive structure at a visually prominent location near Union Square. All other potential environmental effects were found to be at a less-than-significant level or to be mitigated to a less-than-significant level with mitigation measures to be implemented by the project sponsor. (Please see the Initial Study, included in this document as Appendix A, for analysis of issues other than historic architectural resources and visual quality.)

HISTORIC ARCHITECTURAL RESOURCES (p. 28)

The existing 185 Post Street building on the project site is not listed in the *National Register of Historic Places* or the *California Register of Historical Resources*. In its statewide database of historical resources, the State Office of Historic Preservation (OHP) does not list the 185 Post Street building. The existing 185 Post Street building is designated a Category V – Unrated Building in the Downtown Plan, is not identified in the Planning Code as a City Landmark, and was rated “D” - Minor or No Importance by San Francisco Architectural Heritage. The 185 Post Street building is an unreinforced masonry structure designated Risk Level 3 (meaning that retrofit must be completed by February 15, 2004, or the building must be demolished) and Priority IV building (meaning it is not deemed to have high historical/architectural value).

The project site is located within the Kearny-Market-Mason-Sutter Conservation District, which Article 11, Appendix E of the Planning Code describes as follows: “The pattern of development is one of small-scaled, light-colored buildings predominantly four to eight stories in height. The height and scale provide for a streetscape which is attractive to the pedestrian because of the comfortable scale and sidewalks. This dense area is the heart of San Francisco's retail and tourist sectors... .”

Because demolition of the existing 185 Post Street building would be compatible with Planning Code Section 1112.2 (Article 11), “Disposition of Applications to Demolish Contributory Buildings and Unrated Buildings in Conservation Districts,” the proposed demolition would have a less than significant effect on the District. Similarly, because the existing 185 Post Street building is designated a Category V – Unrated Building in the Downtown Plan and is not a Contributory or Significant building to the District, demolition of the existing building would not result in a substantial adverse change to the District or a significant environmental impact.

The Planning Code (Section 7 of Article 11, Appendix E) provides “Standards and Guidelines for Review of New Construction and Certain Alterations” for the District that address building Massing and Composition, Scale, Materials and Colors, and Detailing and Ornamentation. It is against these guidelines that the proposed project must be assessed for its compatibility.

With respect to the proposed building’s massing and composition, the proposed project would be within the range of existing building heights, its rhythm and massing would be in keeping with Significant and Contributory buildings in the District, and it would maintain the prevailing unbroken streetwall. The overall building dimensions would be suitably proportioned and would be consistent with the proportions of Significant and Contributory buildings in the vicinity. However, because the building’s base element would be disproportionately low and its two upper elements would not correspond to the typical proportions of shaft and capital, the project would not be consistent with the prevailing pattern of other Significant and Contributory buildings with respect to composition.

The proposed project would have a base element that would relate to human scale, a typical streetwall height for the District, textural variation on its façade, and a regular rhythm of bays consistent with other buildings in the District. As such, the project’s scale would be consistent with other buildings within the District.

Planning Code Section 7(b)(3) of Article 11, Appendix E states that the “preferred surface materials for this district are brick, stone, and concrete (simulated to look like terra cotta or stone),” that “texture of surfaces can be treated in a manner so as to emphasize the bearing function of the material. . .,” and that “(t)raditional light colors should be used in order to blend in with the character of the district.” The project’s façade would consist of a structural stainless steel exterior that would also include the limited use of travertine. While not actually matching them, the matte-finish stainless steel color of the proposed façade would likely blend in with Significant or Contributory buildings in the vicinity and therefore would be consistent with the guidelines. However, stainless steel is not a preferred surface material, and its use in the District as a façade material is generally limited. The use of stainless steel, particularly in the manner proposed covering almost the entirety of surface area of the facades, would be inconsistent with the guidelines.

Planning Code Section 7(b)(4) of Appendix E states that the District has one of the largest collections of finely ornamented buildings in the City and that these buildings should be used as references for new construction. This section states “Detailing of a similar shape and placement can be used without

directly copying historical ornament.” Detailing and ornamentation of the proposed project would consist of small circular openings and raised disks on the stainless steel façade. The façade would be constructed of a one-inch layer of stainless steel with a beadblast finish, backed by a layer of foil-faced glass insulation and a layer of polycarbonate panels. The circular openings would vary in diameter and would be filled with circular plugs of either stone or glass, set flush with the face of the steel. Layers of material, such as the insulation and panels noted above, and possibly tinted foam, would be visible through the openings. The relief pattern on the stainless steel skin would consist of raised disks, some of which would be hollowed out to act as air intake louvers for the mechanical systems of the building. Detailing and ornamentation of the proposed design appears to achieve the same benefits of visual depth, light and shadow play as do existing Significant and Contributory buildings in the District, and therefore would be consistent with the guidelines.

While the proposed project would be consistent with Article 11, Appendix E, Section 7 standards for new construction with respect to building height, mass, scale, vertical rhythm, and detailing and ornamentation, the project would conflict with standards relating to the building’s overall composition and surface material. Because the proposed project would substantially conflict with Planning Code guidelines established to preserve the character of the District, the project would result in a significant impact upon the Kearny-Market-Mason-Sutter Conservation District. Given the size of the Kearny-Market-Mason-Sutter Conservation District, and given that most of its buildings and its character remains intact from the time it was created, the proposed project would not result in a substantial adverse change, as defined under CEQA, to the District, and would not adversely affect the District such that its significance would be materially impaired.

VISUAL QUALITY (p. 43)

The project site is within a densely built area within Downtown San Francisco. Visual characteristics of the area include historic buildings of various styles intermixed with an array of somewhat more modern buildings. Prevailing building heights range from about four to eight stories, although there are a number of taller structures. The project site is occupied by a vacant six-story building clad in white masonry tile with a regular pattern of metal-framed windows. While the project site is within the Kearny-Market-Mason-Sutter Conservation District, many buildings outside of the Conservation District, particularly high-rises, are clearly visible from the project site and its immediate environs.

The proposed project would result in a visual change since it would demolish an existing six-story building dating from 1908 and construct a new ten-story building in its place. The proposed structure would differ visually from the existing structure in a number of ways. First, while the proposed project would have the same plan dimensions as the existing structure, it would be more than 40 feet taller (130 versus 88 feet). Second, while the existing building is a solid rectangular mass that has continuous street walls flush with the property line, the proposed project would be visually composed of two masses separated with visual breaks in the streetwall at the first and sixth levels. The ground-floor level would be almost entirely glass while the sixth level would be enclosed by a non-structural metallic screen.

Third, the proposed project would have a distinctive architectural design that would differ substantially from the existing building. The proposed building's primary design feature would be a stainless steel structural skin that would cover the entire exterior of the structure's Grant Avenue and Post Street facades. The stainless steel skin with a matte-finish would be perforated with circular windows of varying size through which a palette of interior façade materials of varying translucency and color would be seen. The proposed materials and treatment of the building's façades would be a substantial departure from the existing building and most of the surrounding buildings.

The proposed project would be of a unique modern design that, due to its form, detailing, and materials, would make it visually prominent, especially given its highly visible location at the intersection of Post Street and Grant Avenue near Union Square. The project would not, however, fundamentally differ from the streetwall scale or mass of the existing building on the project site. From views of the project site from the corner of Post Street and Grant Avenue, the proposed project would visually contrast with the historic buildings of traditional styles in the immediate area. However, other modern buildings and older structures that have been remodeled exist within about two blocks away and beyond, and viewing the project site from a farther distance of a block or more, the proposed project would generally tend to be seen within the context of a broader range of building sizes and styles.

Although the project would be architecturally unique, there is nothing about the proposed design that would inherently result in a negative aesthetic effect. Thus, the proposed project would not result in a substantial, demonstrable negative aesthetic effect or substantially degrade the existing visual character or quality of the site and its surroundings. As identified in the Initial Study, the project would not obstruct any publicly accessible scenic views or vistas. The project would likely increase the amount of light emitted from the site as a result of the increased intensity of use of the site (i.e., a larger building with more people using the site), but would not substantially increase ambient light levels in the project area. As such, the project would not result in significant visual quality effects.

C. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

The primary area of controversy associated with the proposed project concerns the proposal to construct an architecturally distinctive 10-story stainless steel structure within the Kearny-Market-Mason-Sutter Conservation District (as established by Article 11 of the San Francisco Planning Code). The Planning Commission will decide whether to approve or disapprove the proposed project after review and certification of the EIR. In selecting or rejecting project alternatives, decision makers may also use other information in the public record.

D. MITIGATION MEASURES (p. 53)

A. CONSTRUCTION AIR QUALITY

- A.1 The project sponsor would require the contractor(s) to sprinkle the project site with water during demolition, excavation and construction activity; sprinkle unpaved exterior construction areas

with water at least twice per day, or as necessary; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during demolition and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose.

B. GEOLOGY

- B.1 Geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsor and contractor would follow the recommendations of the final geotechnical report(s) regarding any excavation and construction for the project. The project sponsor would ensure that the construction contractor would conduct a pre-construction survey of existing conditions and would monitor adjacent building(s) for damage during construction.

C. HAZARDS

C.1

- a. To ensure that workers and the public are not exposed to any potential hazardous materials that may exist in the soil to be excavated, the construction contractor would ensure that workers who are exposed to soil contact wear rubber gloves. In addition, the contractor would ensure that soil disturbed through grading be contained within the immediate area by means such as washing workers' shoes and washing earthmoving equipment (using recycled water as described in Mitigation Measure No. A1) prior to workers and equipment leaving the area where grading occurs. Other dust control measures included in Mitigation Measure No. A1 would also serve to prevent the dispersion of potentially contaminated soil.
- b. The project sponsor would ensure that building surveys for PCB-containing equipment (including elevator equipment), hydraulic oils, fluorescent lights, and lead-based paint are performed prior to the start of renovation. Hazardous materials discovered during these surveys would be abated according to federal, State, and local laws and regulations. Asbestos-containing materials would be removed and disposed of or encapsulated prior to renovation and reuse of the building. Interior asbestos-containing materials would be removed as part of the project. All asbestos abatement and encapsulation procedures would be performed in accordance with applicable federal and State guidelines. Equipment identified as containing PCB oils would be removed and properly disposed. Construction and renovation activities that disturb exterior surfaces containing lead-based paint would comply with Chapter 36 of the San Francisco Building Code for the identification, safe work practices, proper removal methods, and notification.

D. ARCHAEOLOGICAL RESOURCES

- D.1 Should evidence of archaeological resources of potential significance be found during ground disturbance, the project sponsor would immediately notify the Environmental Review Officer (ERO) and would suspend any excavation which the ERO determined could damage such archaeological resources. Excavation or construction activities which might damage discovered cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the project sponsor would select an archaeologist to assist the Office of Environmental Review in determining the significance of the find. The archaeologist would prepare a draft report containing an assessment of the potential significance of the find and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO would recommend specific additional mitigation measures to be implemented by the project sponsor.

Mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of cultural materials. Finally, the archaeologist would prepare a draft report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report(s) would be sent by the archaeologist directly to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center. Three copies of the final archaeology report(s) shall be submitted to the Office of Environmental Review, accompanied by copies of the transmittals documenting its distribution to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center.

E. ALTERNATIVES TO THE PROPOSED PROJECT (p. 57)

ALTERNATIVE A: NO PROJECT

This alternative would entail no change to the site, which would remain in its existing condition. As the 185 Post Street building would not be demolished, no new construction would occur.

As an unreinforced masonry structure, without seismic upgrade, the existing building would remain a potential safety hazard, whereas the proposed building would be constructed to meet current building code requirements for seismic safety. Unless the 185 Post Street building was upgraded to accommodate other tenants or demolished pursuant to the UMB Ordinance, this alternative would not result in: temporary construction impacts, such as noise, dust and construction traffic; an increase in travel to and from the project site; or any of the impacts described in the Initial Study, such as a minor increase in shadow on Post Street.

Reoccupancy of the currently vacant 185 Post Street building, either before or after seismic upgrade pursuant to the UMB Ordinance, would generate incrementally greater traffic and air pollutant emissions, compared to existing conditions. However, whether such occupancy or seismic upgrade would occur is purely speculative.

Because, as an existing structure, the 185 Post Street building is not required to comply with the Planning Code's compatibility guidelines for the Conservation District, the No Project Alternative would technically avoid inconsistency with the standards of Planning Code Article 11, Appendix E, Section 7,

relating to the Kearny-Market-Mason-Sutter Conservation District. However, with respect to impacts on the District, unless the existing building was redesigned as part of a seismic upgrading, the No Project Alternative would likely have similar effects as the proposed project. This would be the case because, like the proposed project, the No Project Alternative would result in a building that is non-contributory to the District and is not wholly compatible with the District's Planning Code guidelines, occupying the site. The No Project Alternative would not meet any of the project sponsor's objectives.

ALTERNATIVE B: DESIGN GUIDELINE-COMPLIANT

Under this alternative, a new building of the same size, height, width, mix of uses, and internal layout as the proposed project would be constructed. However, where the proposed project fails to comply with the standards of Article 11, Appendix E, Section 7 for compatibility with the Kearny-Market-Mason-Sutter Conservation District, this alternative would be designed to achieve consistency with the standards. The façade would be clad with masonry and would contain rectangular windows recessed from the building face. A belt course would extend across the façade of the building above the second level, defining a base. Another horizontal element, a cornice, would extend across the façade above the eighth level separating the shaft and capital.

This alternative would be of the same height, mass, and dimensions as the proposed project, and would be consistent with the guidelines with respect to these building characteristics, as would the proposed project. This alternative would have a clear base element, shaft and capital, and such elements would be of similar proportions as the prevailing pattern of such compositions in the District. This alternative would be constructed to the street property line, compatible with the guidelines, as would the proposed project. Divisions along the building façade, including the base element and windows, would relate this alternative to human scale, as would the proposed project. Masonry surface material of a light color would be used with this alternative, consistent with the preferred surface materials noted in the guidelines. As discussed, building details and ornamentation would include recessed rectangular windows, a belt course, and a cornice, consistent with traditional ornamentation prevalent in the District. As such, this alternative would comply with the standards for new construction within the District, and would have a less-than-significant effect upon the Kearny-Market-Mason-Sutter Conservation District.

Because this alternative would result in the same amount of floor space compared to the proposed project, transportation and related air-quality impacts would be the same less-than-significant effects as with the proposed project. As the building envelope under this alternative would not change, shadow effects would be less-than-significant, as with the proposed project. Temporary construction impacts associated with the proposed project, such as noise, dust and construction traffic, would occur under this alternative, because this alternative would involve similar construction activities at the project site. Other effects described in the Initial Study related to the intensity of development (*e.g.*, increases in employment) would be the same as with the proposed project. This alternative would likely not meet most of the project sponsor's objectives related to the building's design.

CHAPTER II

PROJECT DESCRIPTION

A. SITE LOCATION AND PROJECT CHARACTERISTICS

The project site (Lot 18 of Assessor's Block 310) is one block east of Union Square in downtown San Francisco, at the southeast corner of Post Street and Grant Avenue (see Figure 1). The 3,600-square-foot project site, situated within the Kearny-Market-Mason-Sutter Conservation District, is occupied by a vacant six-story-plus-basement structure that consists of approximately 15,400 square feet of retail space and 10,800 square feet of office space.

The project would consist of demolition of the existing 26,200-square-foot building and construction of a new ten-story-plus-basement,² 130-foot tall building that would serve as the West Coast headquarters and retail store of the apparel company Prada USA. The new structure would contain approximately 39,300³ square feet (sq. ft.), with part of the basement serving as storage and mechanical equipment space, display space and a reception area on the ground-floor, retail space on the second through fifth levels, open space on the sixth level, showroom space on the seventh level, office space on the eighth and ninth levels, and a private residential space on the top floor (see Figures 2-5 for representative floor plans). In total, the project would provide approximately 4,400 sq. ft. of office space, 6,800 sq. ft. of retail space, 1,500 sq. ft. of showroom space, 1,700 sq. ft. of residential space, 2,250 sq. ft. of open space, and 22,650 sq. ft. of storage and other space.⁴ The proposed structure at a height of 130⁵ feet would be 42 feet taller than the 88-foot tall structure currently on the project site.

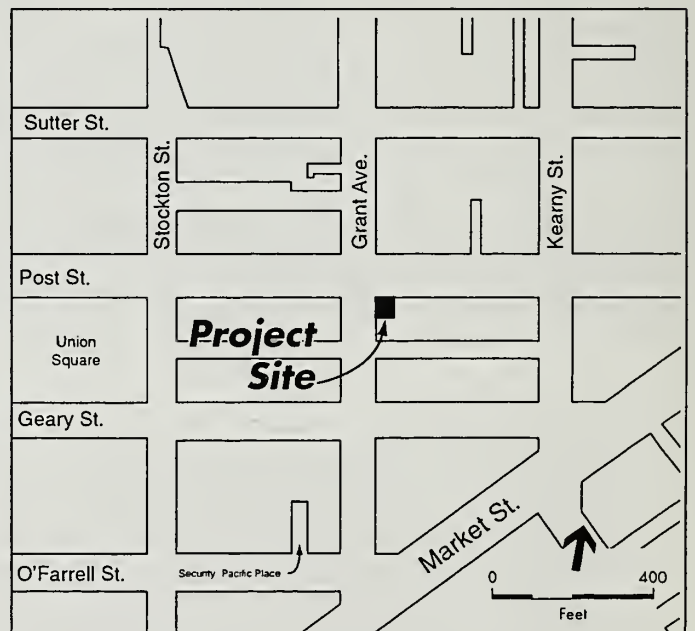
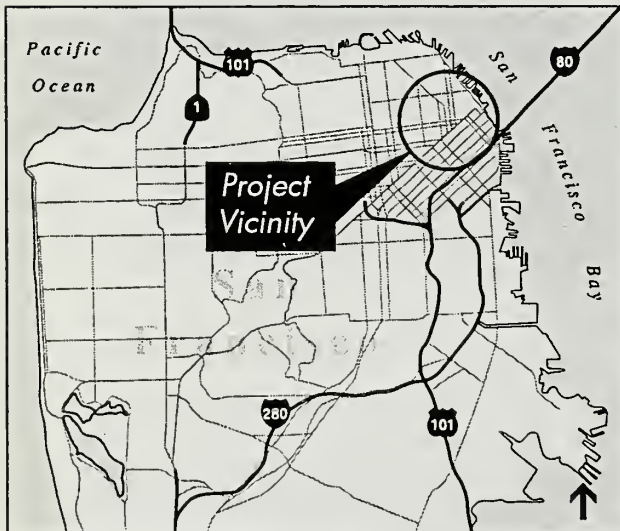
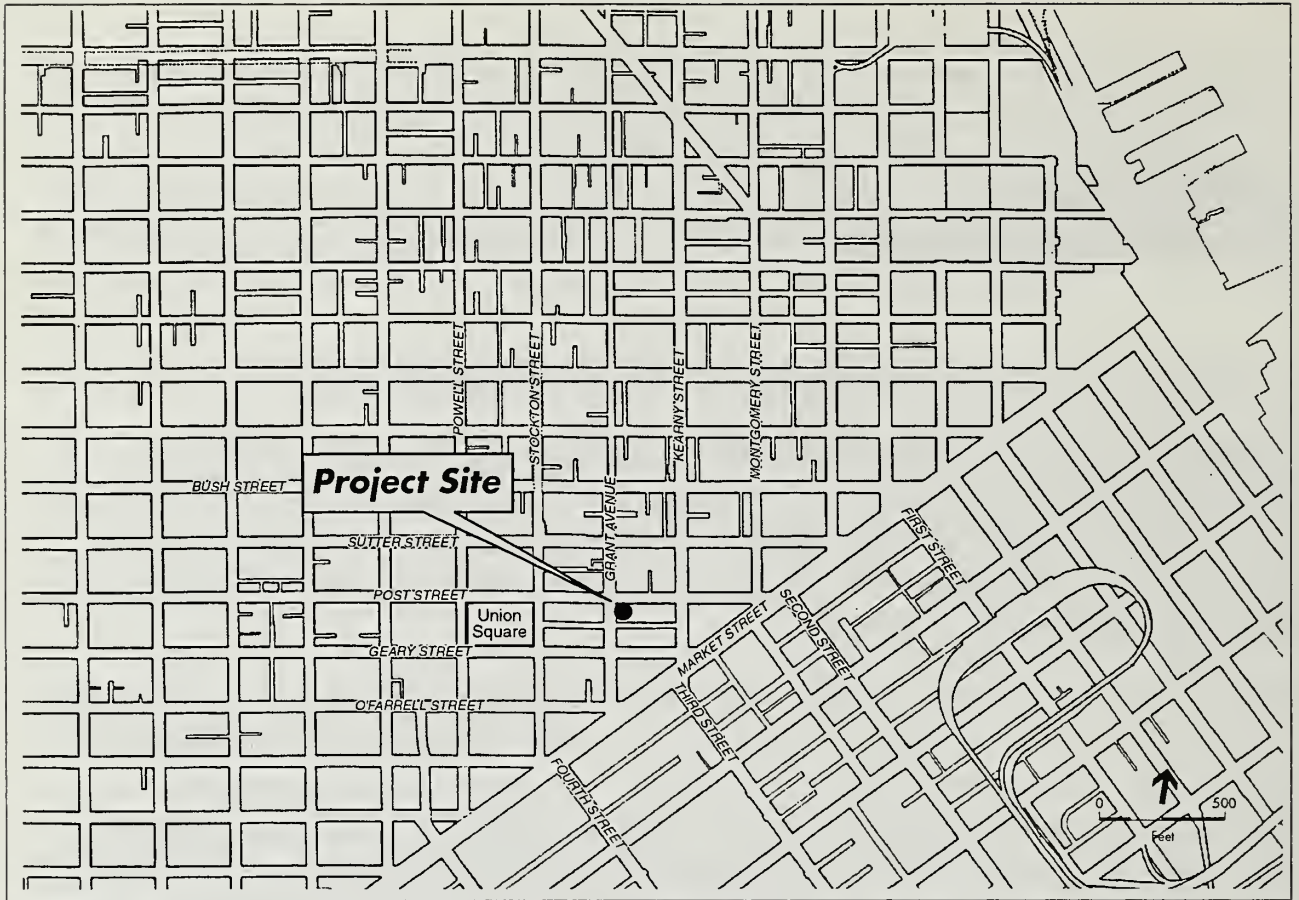
The ground-floor of the ten-story project building would function as a reception area for both the headquarters operations and the retail store, and would include areas for retail display, small public gatherings, and art exhibits. Building patrons would enter the glass-enclosed ground-floor space from

² The basement would include one full level and one partial "sub-basement." The 1,767 square-foot sub-basement would house the elevator machine room, water storage, and transformer chamber.

³ This number reflects the total square feet of the proposed project, an amount greater than the "gross floor area" as defined by Planning Code Section 102.9. Gross Floor Area, which in the case of the proposed project would not include the open space on sixth level or the storage/mechanical space in the basement, is used for calculating a project's FAR.

⁴ The 22,560 sq. ft. of "storage and other space" includes the following: 1,767 sq. ft. in the sub-basement (as noted in footnote 1); the entire 5,053 sq. ft. basement (storage, mechanical, and stairs); 1,718 sq. ft. on the ground floor (cores and corridors); between 1,054 sq. ft. and 1,515 sq. ft. of core and stair space on the second and fourth through ninth floors; 2,162 sq. ft. of primarily restroom, core, and stair space on the third floor; and 580 sq. ft. of primarily mechanical space on the roof.

⁵ The roof line of the proposed project would be at 130 feet (with an exception granted for exceeding the base 80-foot height as allowed pursuant to Planning Code Sections 263.8 and 309), while mechanical equipment screened behind a parapet would extend to 139 feet (with the additional 9 feet exempted from the height limit by Planning Code Section 260(b)(1)).



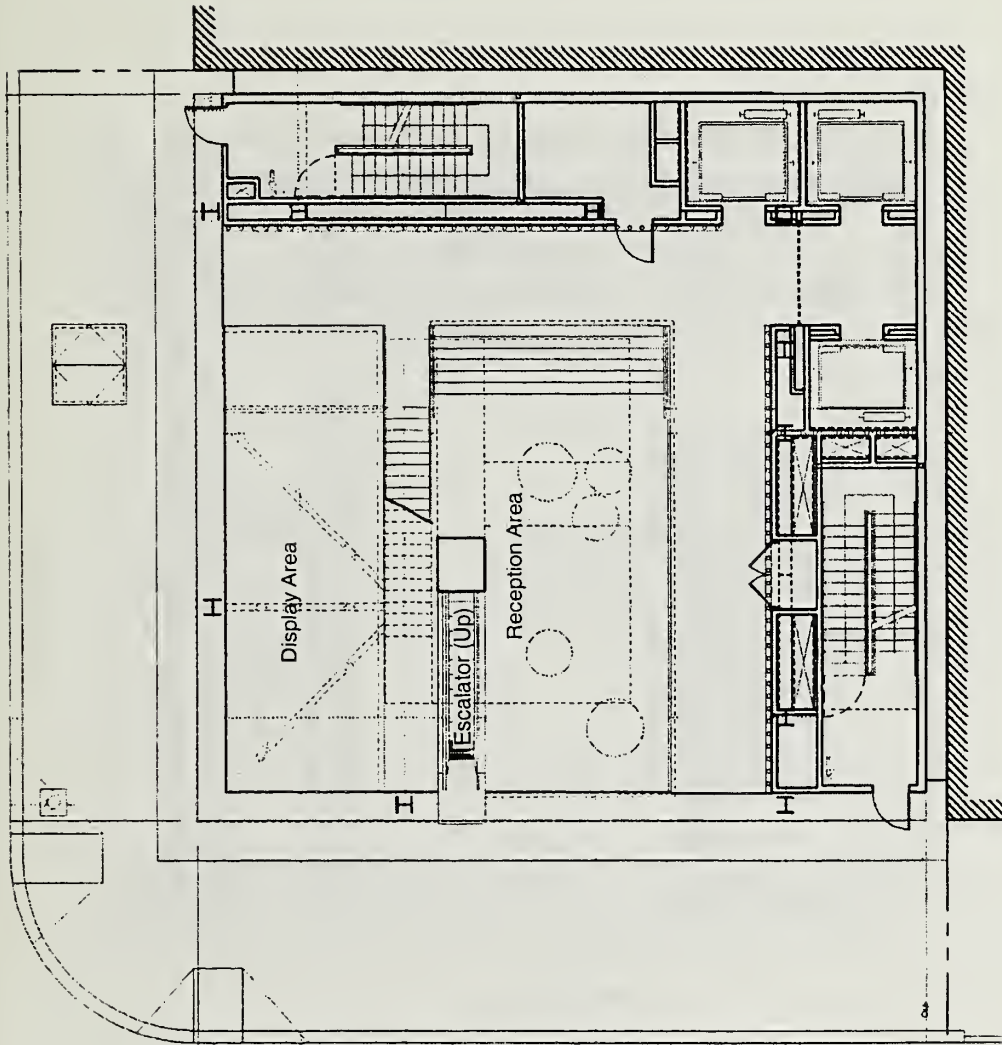
SOURCE: Environmental Science Associates

185 Post Street / 200249 ■

Figure 1
Project Location

POST STREET

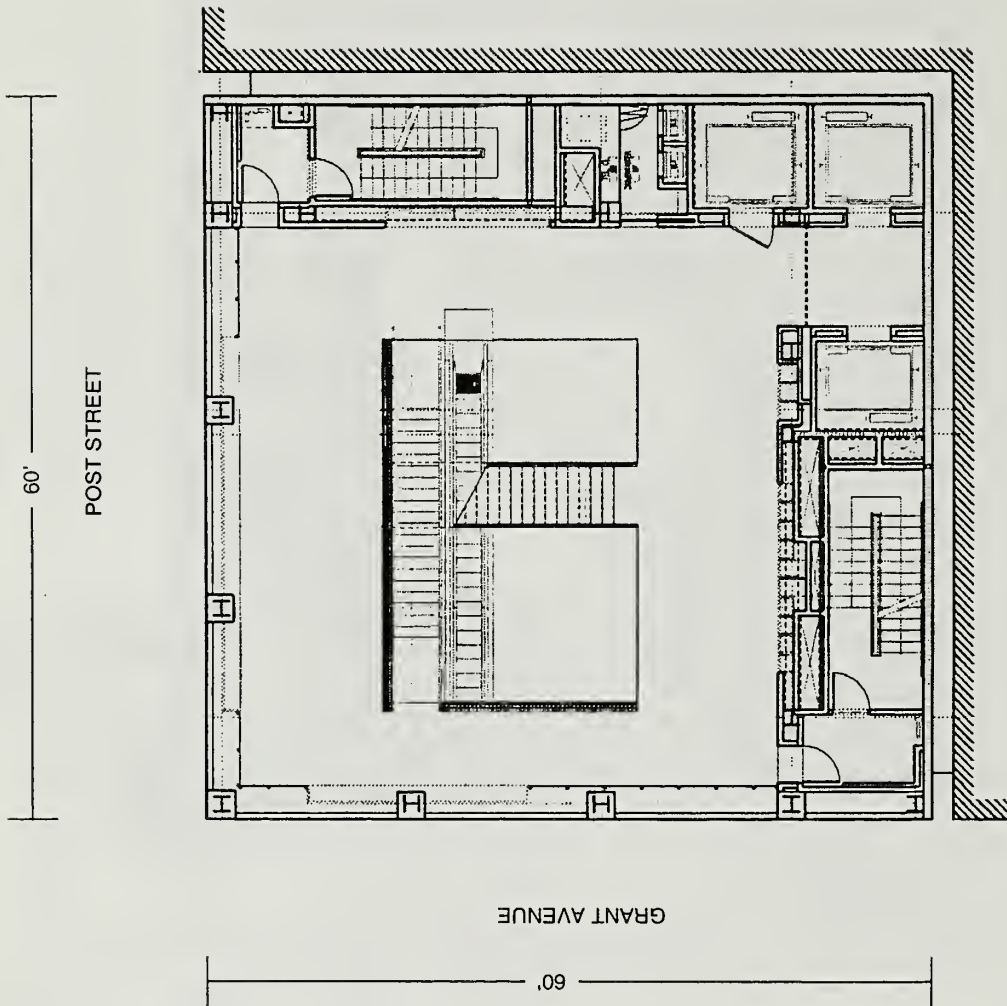
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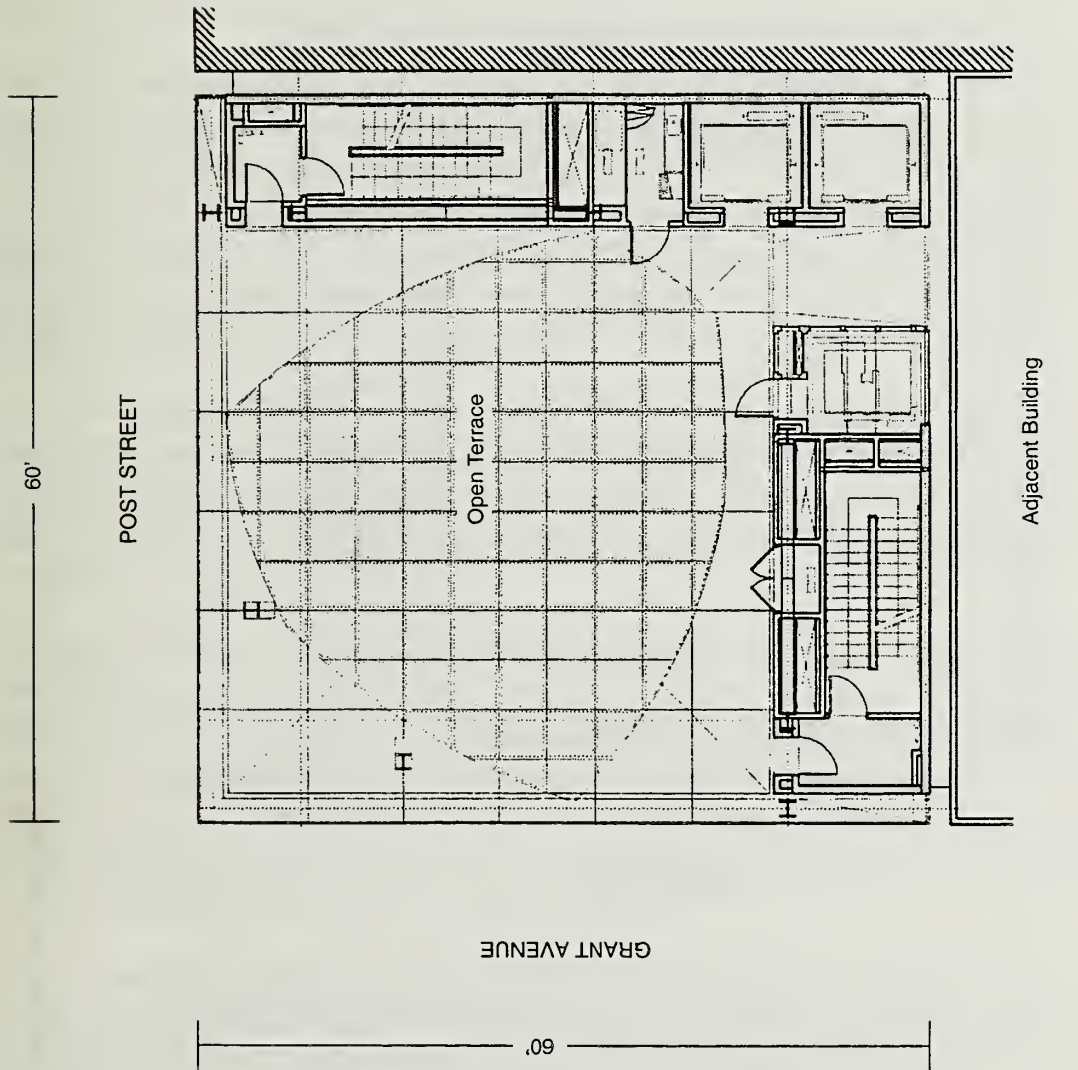
SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249 ■
Figure 2
Ground Floor Plan



SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249 ■
Figure 3
 Second Floor Plan
 (Retail)

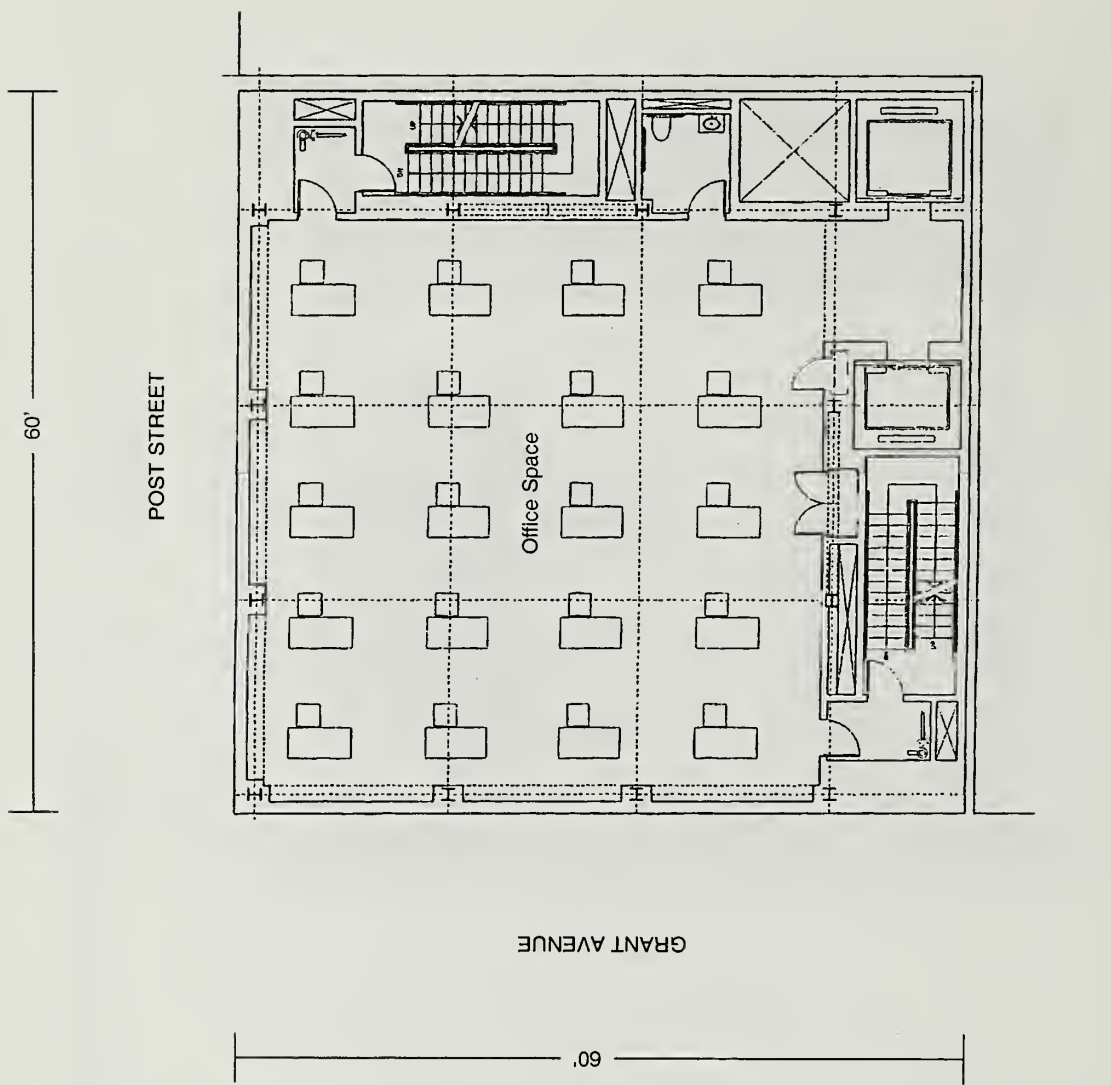


SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249

Figure 4

Sixth Floor Plan
(Public Open Space)



SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249 ■
Figure 5
 Eighth Floor Plan
 (Office)

either Grant Avenue or Post Street, from where they would access the second-floor retail level via a glass staircase or one of three passenger elevators (one also useable as a freight elevator). An escalator accessible directly from Grant Avenue would also provide access to the second level (see Figure 2). Also located on the ground floor would be two emergency exits from two sets of enclosed stairways.

The second through fifth floor retail spaces, each of which would have a distinctive layout and inter-floor connection, would be open to the public during business hours. The sixth floor open space, which would be enclosed by a decorative metallic screen, would similarly be accessible to the public and would feature a coffee bar and seating. The showroom, offices, and private residential unit on the uppermost four levels would not be publicly accessible. The residential unit would be for the exclusive use of the project sponsor.

The building's façade, which would extend to the site's property lines, would be composed of stainless steel, stone, and glass. The matte-finished stainless steel structural skin, which would bear a substantial portion of the building's lateral load, would be articulated with circular windows and raised steel disks of varying size in a pattern that would express the floor slabs and grid of supporting steel beams and columns concealed by the facade (see Figures 6 through 9 for representative elevations). The perforations would also allow diffused interior lighting and glimpses of interior building uses to be visible from outside the building.

The existing six-story-plus-basement building at 185 Post Street is constructed of steel and concrete. Built in 1908, but completely remodeled through numerous alterations beginning in 1951,⁶ it is a Category V (Unrated) Building (Building not significant or Contributory) within the Kearny-Market-Mason-Sutter Conservation District and was rated "D" (Minor or No Importance) by San Francisco Architectural Heritage.

The project's floor area ratio (FAR) would be 8.7:1, which exceeds the basic permitted FAR in the C-3-R District (without transfer of development rights to the site) of 6:1. However, the project would be within the allowable maximum FAR of 9:1 with the transfer of development rights. A site from which the development rights would be transferred has yet to be identified. Because the project site is located within the 80-130-F Height and Bulk District, the proposed project would require an exception to exceed 80 feet in height. The existing site does not have parking or a loading dock, and no parking or loading accommodations would be provided as part of the project.

Project construction, including demolition of the existing building, would take approximately 16 to 19 months, with opening of the proposed building planned for fall 2002. The project architects are Rem Koolhaas of the Office for Metropolitan Architecture in Rotterdam, The Netherlands, and Brand + Allen Architects of San Francisco.

⁶ According to building permit records, a total of 19 different permits were issued between 1951 and 1997 for a wide range of building alterations.

139'
Top of
Parapet
Roofline

LOUVERS

TRAVERTINE

ULTRA CLEAR GLASS

STAINLESS DISKS

PUBLIC TERRACE

130'

DISPLAY
AREA

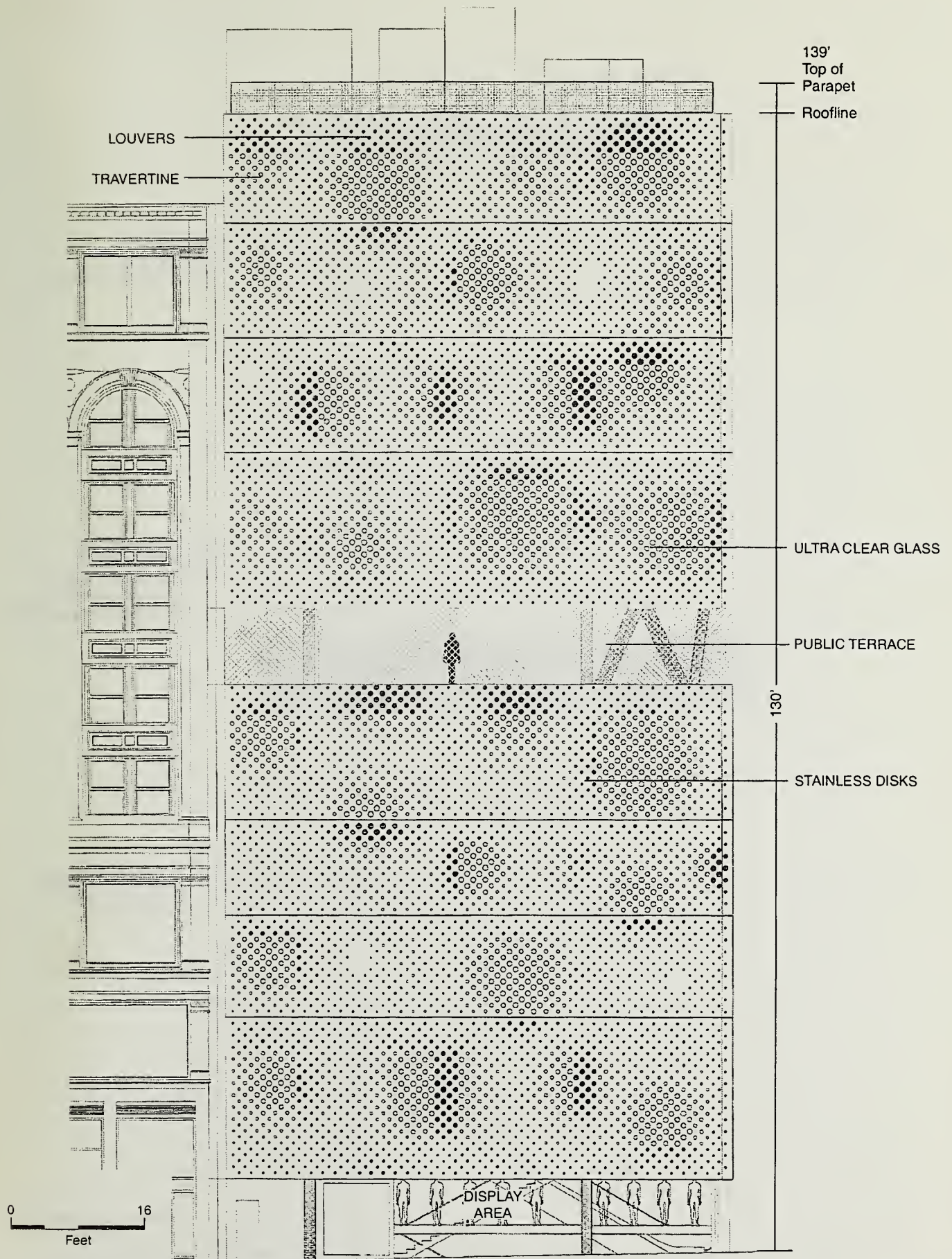
ESCALATOR

0 16
Feet

SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249 ■

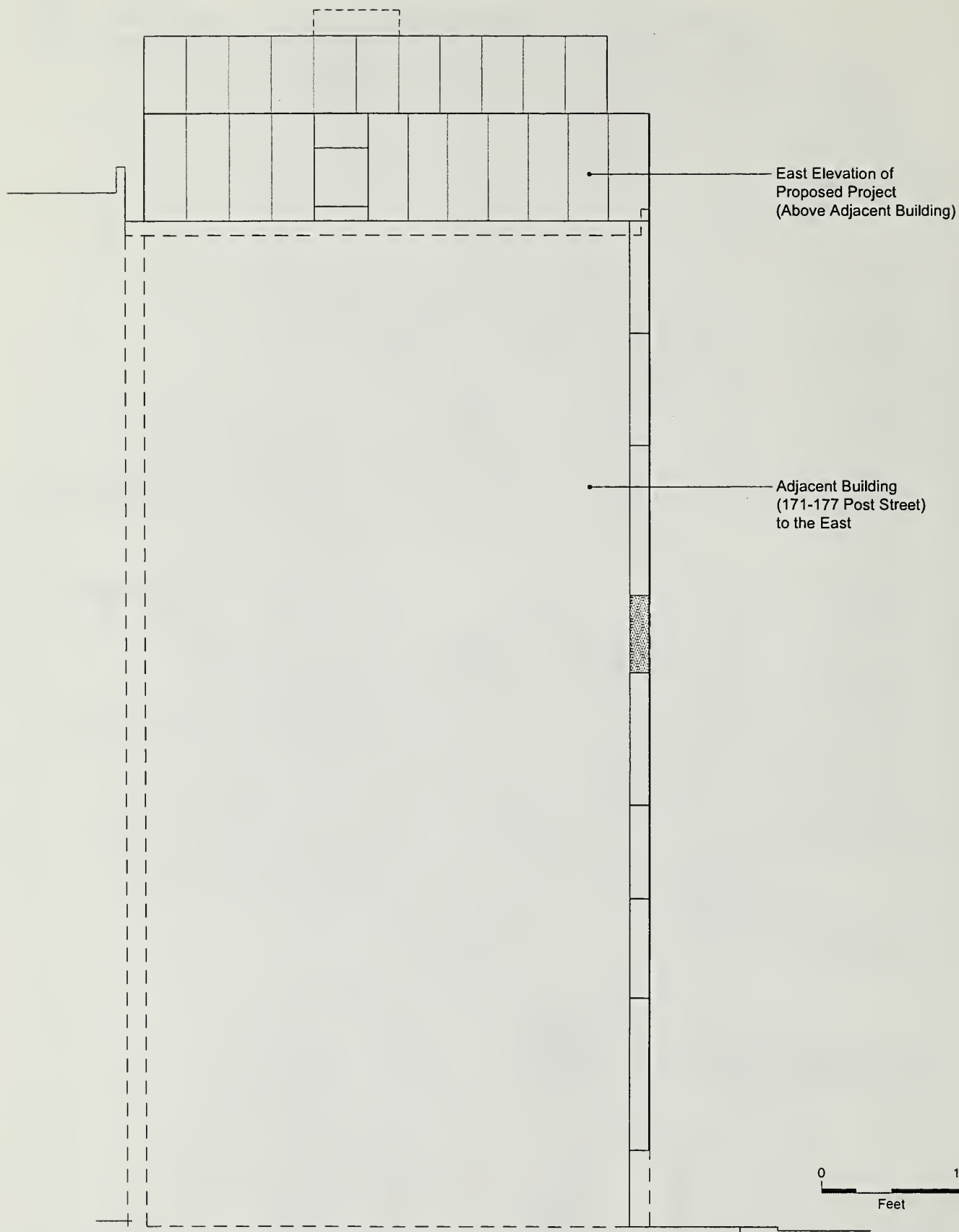
Figure 6
West Elevation (Grant Avenue)



SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249 ■

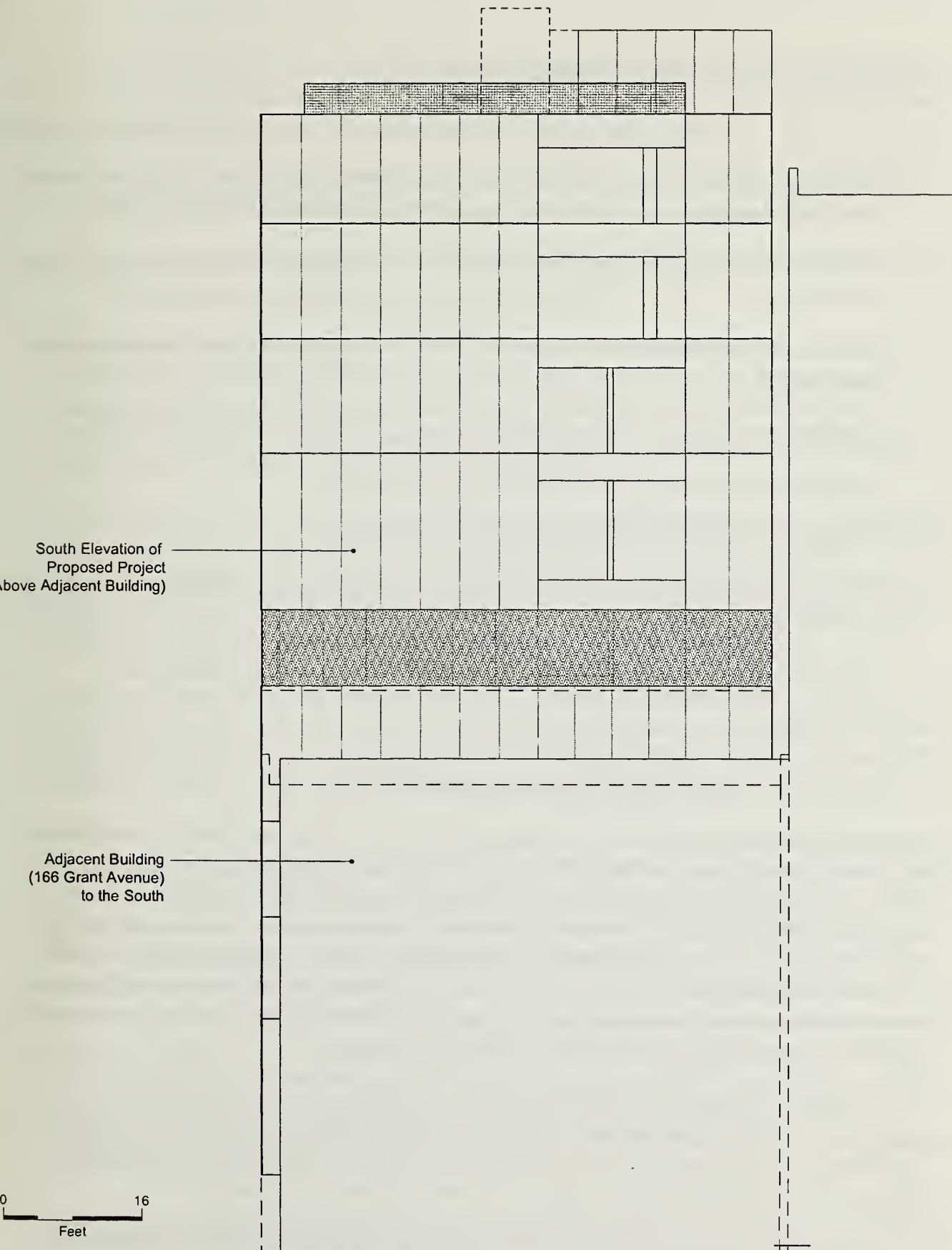
Figure 7
North Elevation (Post Street)



SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249 ■

Figure 8
East Elevation



B. PROJECT SPONSOR'S OBJECTIVES

The project sponsor's objectives are as follows for the proposed retail, office, residential project at 185 Post Street:

- To convert a site with a long-vacant, architecturally nondescript building into the locale of a world-class piece of architecture to serve as the sponsor's West Coast retail and office headquarters;
- To create a world-renowned architectural signature in San Francisco for one of the world's leading fashion houses;
- To convert an underutilized site on a prominent corner into a hub of public activity one block from Union Square;
- To enhance the vitality of the Union Square retail area;
- To pioneer the use of novel state-of-the-art seismic technology;
- To replace the existing building with a seismically safer structure;
- To allow the façade to express the lateral (seismic) and vertical (gravity) structure while remaining consistent with the building's location in a Conservation District;
- To provide dramatic outdoor public open space within the envelope of the building; and
- To develop a project with minimal environmental disruption.

C. PROJECT APPROVAL REQUIREMENTS

This EIR will undergo a public comment period as noted on the cover, including a public hearing before the Planning Commission on the Draft EIR. Due to the location of the proposed project within a Conservation District, the Landmarks Preservation Advisory Board (LPAB) may also provide written comments on the Draft EIR. Following the public comment period, responses to written and oral comments will be prepared and published in a Draft Summary of Comments and Responses document. The Draft EIR will be revised as appropriate and, with the Draft Summary of Comments and Responses, presented to the Planning Commission for certification as to accuracy, objectivity, and completeness. No approvals or permits may be issued before the Final EIR is certified.

Section 309 of the Planning Code, Permit Review in C-3 Districts, governs the review of project authorization and building and site permit applications in the C-3 Districts. The project would require review and approval at a public hearing by the Planning Commission under Section 309 because the sponsor seeks exceptions, pursuant to Section 309, to the following Code sections:

- Exception to Height Limits in the 80-130-F Height and Bulk District (Section 263.8), because the project would exceed the base permitted height of 80 feet;

- Sunlight Access to Public Sidewalks in C-3 Districts (Section 146), because, above 66 feet in height, the proposed project would not be set back such that it would avoid penetration of a sun angle of 50 degrees;
- Reduction of Ground-level Wind Currents in C-3 Districts (Section 148), because the project would not eliminate all of the existing pedestrian comfort criteria exceedances; and
- Rear Yard Reduction Requirements in C-3 Districts (Section 134(d)), because the project would not provide a rear yard setback at the top level residence.

Section 309 also permits the imposition of certain conditions in regard to such matters as a project's siting and design; view, shadow and wind characteristics; parking, traffic and transit effects; energy consumption; pedestrian environment; and other matters. In addition, the project would require conditional use authorization by the Planning Commission pursuant to Section 219(c) of the Planning Code to establish an office use within the C-3-R District.

Due to the project site's location in the Kearny-Market-Mason-Sutter Conservation District, construction of the proposed building would require authorization under Article 11 of the Planning Code, "Preservation of Buildings and Districts of Architectural, Historical, and Aesthetic Importance in the C-3 Districts." The project would also be subject to Planning Code Section 295 (shadow on certain public open spaces) and, as noted, Section 146 (sunlight on public sidewalks in the C-3 districts).

Environmental plans and policies, like the Bay Area '97 *Clean Air Plan*, directly address physical environmental issues and/or contain standards or targets that must be met in order to preserve or improve specific components of the City's physical environment. The proposed Project would not obviously or substantially conflict with any such adopted environmental plan or policy.

On November 4, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the Planning Code and established eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service sectors from commercial office development and enhancement of resident employment and business ownership; maximization of earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under the California Environmental Quality Act (CEQA), or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project is consistent with the Priority Policies. The motion for the Section 309 consideration will contain the analysis determining whether the 185 Post Street project is in conformance with the Priority Policies.

The *San Francisco General Plan* (General Plan), which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. In general,

potential conflicts with the General Plan are considered by the decision-makers (normally the Planning Commission) independently of the environmental review process, as part of the decision to approve, modify or disapprove a proposed project. Any potential conflict not identified here could be considered in that context, and would not alter the physical environmental effects of the proposed project. The Planning Commission would review the project in the context of applicable objectives and policies of the General Plan. See the Land Use section, Chapter III.A, for a discussion of some of the relevant objectives and policies.

CHAPTER III

ENVIRONMENTAL SETTING AND IMPACTS

A. ZONING AND LAND USE

The Initial Study concluded that the Project would not have adverse land use impacts. Land use setting information is included in the EIR for informational purposes.

Land uses on, adjacent to and near the project site are a primarily retail, with upper-story office uses in many buildings. Union Square, the preeminent Downtown open space, is one block to the west of the project site.

Land uses in the project vicinity are predominantly retail, with upper-story office uses in many buildings. Adjacent to the project site to the south is a three-story retail clothing store, while adjacent to the east is an eight-story building with ground-floor retail space and offices above. Across Post Street and Grant Avenue are buildings that primarily have ground-floor retail and office uses on upper floors. Building heights are typically three to five stories, although there are some buildings three to twelve stories tall.

The Planning Code, which incorporates by reference the City Zoning Maps, governs land uses, densities and configuration of buildings within San Francisco. Permits to construct new buildings or to alter or demolish existing ones may not be issued unless the proposed project conforms to the Code or an exception is granted pursuant to provisions of the Code.

The project site is within a C-3-R (Downtown Retail) Zoning District. The Planning Code states that the C-3-R District “is a regional center for comparison shopper retailing and direct consumer services. It covers a compact area with a distinctive urban character, consists of uses with cumulative customer attraction and compatibility, and is easily traversed by foot” (Section 210.3). Retail sales, office, and residential dwellings are principal permitted uses in the C-3-R District.

The project site is within the 80-130-F Height and Bulk District (80-foot basic height limit, with exceptions for heights up to 130 feet provided there are no adverse shadow effects, the taller building provides an appropriate transition to adjacent buildings, and the height above 80 feet is set back from the street to maintain a continuity of street wall height; the “F” bulk limit indicates a maximum plan dimension of 110 feet and maximum diagonal dimension of 140 feet, above 80 feet in height). The 130-foot tall proposed project would exceed the basic permitted height, but would comply with the bulk limit. While the proposed project would be much taller than the adjacent building to the south fronting Grant Avenue, it would be generally consistent with the prevailing streetwall height of other buildings along Post Street. The project would have a floor area ratio (FAR) of 8.7:1, which exceeds the maximum basic

FAR permitted in the C-3-R district of 6:1, but would be under the maximum allowable of 9:1 with Transfer of Development Rights (TDRs) per Planning Code Section 123(c)(1). Zoning in the project vicinity is generally C-3-R, except that Union Square is in a P (Public) Use District.

As noted in Chapter II, Project Description, under Approvals, the project would be subject to Section 309 of the Planning Code, Permit Review in C-3 Districts. The project would require review and approval at a public hearing by the City Planning Commission under Section 309 because the sponsor seeks various exceptions, pursuant to Section 309 (see Section II.C, Project Approval Requirements).

RELEVANT POLICIES OF THE GENERAL PLAN

As discussed, the San Francisco *General Plan* provides general policies and objectives to guide land use decisions. The *General Plan* contains many policies that may address different goals, and projects may be consistent with certain policies and inconsistent with others. However, a conflict with a General Plan policy does not, in itself, indicate a significant effect on the environment. To the extent that physical impacts may result from such conflicts, such physical impacts are identified in the environmental analysis.

The proposed project would not obviously or substantially conflict with the General Plan. The Planning Commission, in deciding whether to approve the proposed project, must decide whether any inconsistencies with policies relating to historic preservation would be outweighed by the proposed project's conformity with other policies and objectives. Some relevant General Plan objectives and policies are noted below.

DOWNTOWN PLAN

- Objective 1, Policy 1, to “Encourage development which produces substantial net benefits and minimizes undesirable consequences. Discourage development which has substantial undesirable consequences which cannot be mitigated.”
- Objective 3, to “Improve Downtown San Francisco’s position as the region’s prime location for specialized retail trade.”
- Objective 3, Policy 1, to “Maintain high quality specialty retail shopping facilities in the retail core.”
- Objective 12, to “Conserve resources that provide continuity with San Francisco’s past.”
- Objective 12, Policy 1, to “Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.”

- Objective 12, Policy 3, to “Design new buildings to respect the character of older development nearby.”
- Objective 13, Policy 1, to “Relate the height of buildings to important attributes of the city pattern and to the height and character of existing and proposed development.”
- Objective 14, Policy 1, to “Promote building forms that will maximize the sun access to open spaces and other public areas.”
- Objective 14, Policy 2, to “Promote building forms that will minimize the creation of surface winds near the base of buildings.”
- Objective 15, Policy 1, to “Ensure that new facades relate harmoniously with nearby facade patterns.”
- Objective 15, Policy 2, to “Assure that new buildings contribute to the visual unity of the city.”
- Objective 15, Policy 3, to “Encourage more variation in building facades and greater harmony with older buildings through use of architectural embellishments and bay or recessed windows.”
- Objective 16, Policy 1, to “Conserve the traditional street to building relationship that characterizes downtown San Francisco.”
- Objective 16, Policy 2, to “Provide setbacks above a building base to maintain the continuity of the predominant streetwalls along the street.”
- Objective 16, Policy 3, to “Maintain and enhance the traditional downtown street pattern of projecting cornices on smaller buildings and projecting belt courses on taller buildings.”
- Objective 16, Policy 4, to “Use designs and materials and include activities at the ground floor to create pedestrian interest.”
- Objective 16, Policy 5, to “Encourage the incorporation of publicly visible art works in new private development and in various public spaces downtown.”
- Objective 21, Policy 1, to “Provide off-street facilities for freight loading and service vehicles on the site of new buildings sufficient to meet the demands generated by the intended uses. Seek opportunities to create new off-street loading for existing buildings.”
- Objective 23, to “Reduce hazards to life safety and minimize property damage and economic dislocations resulting from future earthquakes.”
- Objective 23, Policy 2, to “Initiate orderly abatement of hazards from existing buildings and structures, while preserving the architectural and design character of important buildings.”

COMMERCE AND INDUSTRY ELEMENT

- Objective 1, to “Manage economic growth and change to ensure enhancement of the total city living and working environment.”
- Objective 1, Policy 1, to “Encourage development which provides substantial net benefits and minimizes undesirable consequences. Discourage development which has substantial undesirable consequences that cannot be mitigated.”
- Objective 1, Policy 2, to “Assure that all commercial and industrial uses meet minimum, reasonable performance standards.”
- Objective 1, Policy 3, to “Locate commercial and industrial activities according to a generalized commercial and industrial land use plan.”
- Objective 2, to “Maintain and enhance a sound and diverse economic base and fiscal structure for the city.”
- Objective 2, Policy 1, to “Seek to retain existing commercial and industrial activity and to attract new such activity to the city.”
- Objective 3, Policy 1, to “Promote the attraction, retention and expansion of commercial and industrial firms which provide employment improvement opportunities for unskilled and semi-skilled workers.”

URBAN DESIGN ELEMENT

- Objective 1, Policy 3, to “Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts.”
- Objective 2, Policy 4, to “Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.”
- Objective 2, Policy 6, to “Respect the character of older development nearby in the design of new buildings.”
- Objective 2, Policy 7, to “Recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco’s visual form and character.”
- Objective 3, “Moderation of major new development to complement the city pattern, the resources to be conserved, and the neighborhood environment.”
- Objective 3, Policy 1, to “Promote harmony in the visual relationships and transitions between new and older buildings.”
- Objective 3, Policy 2, to “Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance.”

- Objective 3, Policy 3, to “Promote efforts to achieve high quality of design for buildings to be constructed at prominent locations.”
- Objective 3, Policy 4, to “Promote building forms that will respect and improve the integrity of open spaces and other public areas.”
- Objective 3, Policy 5, to “Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.”
- Objective 3, Policy 6, to “Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.”

B. HISTORIC ARCHITECTURAL RESOURCES

SETTING

PROJECT SITE

The existing building at the 185 Post Street site is a six-story-over-basement structure of steel and concrete. Built in 1908, it has been completely remodeled through numerous alterations beginning in 1951. Currently, the building is clad in white masonry tile, with a regular pattern of window openings framed in red-painted metal. The building was historically used as office and retail but has been vacant since about 1997.

RATING BUILDINGS OF ARCHITECTURAL AND HISTORIC IMPORTANCE

State Office of Historic Preservation Listing

The 185 Post Street building is not listed in the *National Register of Historic Places* or the *California Register of Historical Resources*. In its statewide database of historical resources, the State Office of Historic Preservation (OHP) does not list the 185 Post Street building.

The Downtown Plan and Planning Code

The project site is in the area covered by the Downtown Plan, which is an area plan within the San Francisco General Plan. Article 11 of the Planning Code, which addresses preservation of buildings and districts of architectural, historical, and aesthetic importance, classifies buildings in the C-3 Zoning Districts (generally, Downtown) within four Categories, I through IV, as established in the Downtown Plan. The Downtown Plan identified the most important buildings, called “Significant Buildings,” as Category I and Category II buildings. Under the Downtown Plan and Article 11, these structures are Buildings of Individual Importance, are at least 40 years old, and are rated Excellent in Architectural Design or Very Good in both Architectural Design and Relationship to the Environment, with the difference between Category I and Category II being the extent of alteration. The Downtown Plan identified a second tier of structures, called “Contributory Buildings,” as Category III and Category IV buildings. Under the Downtown Plan and Article 11, among Contributory Buildings, Category III buildings are Buildings of Individual Importance, but of lesser architectural and/or contextual merit than Category I and II buildings, are at least 40 years old, and are located outside six conservation districts designated in Article 11. Category IV buildings are located within conservation districts, are at least 40 years old, may be Buildings of Individual Importance or Buildings of Contextual Importance, and are of lesser architectural and/or contextual merit than Category I and II buildings. All remaining Downtown buildings are Unrated, Category V. The Downtown Plan designations were adopted after noticed public hearings, and a procedure for reconsideration was included in Article 11.

The Downtown Plan calls for preservation of Category I and II buildings and encourages, but does not require, preservation of Category III and IV buildings. To this end, one of the primary tools employed in the Planning Code is the Transfer of Development Rights, which allows a property owner of a building on an approved preservation lot to transfer to another site (the development lot) the allowable development envelope under the Planning Code that is not fully occupied by the building to be preserved. Article 11 of the Planning Code, in general, prohibits demolition of Category I and II buildings (and Category III and IV buildings from which development rights have been transferred) unless it can be demonstrated that the buildings have no substantial market value or reasonable use, after taking into account costs of rehabilitation and any development rights transferred. Demolition of Category III and IV buildings from which no development rights have been transferred is generally permitted under Article 11. Transfer of development rights is proposed as part of the Project.

The Downtown Plan architectural survey assigned each building a numerical score for 13 categories in four headings that are based on criteria used earlier by San Francisco Architectural Heritage (“Heritage”) in its survey of Downtown buildings (see below). The Downtown Plan survey also collected planning data such as zoning and floor-area ratio and submitted the information to a five-member review committee that assigned each building to one of the five categories. The existing 185 Post Street building is designated Category V – Unrated Building.

The 185 Post Street building is not identified in Article 10 of the Planning Code as a City Landmark.

Heritage Survey

As noted, Heritage previously surveyed downtown structures and, in 1979, published the results in the book *Splendid Survivors*. The Heritage survey employed 13 rating categories in four headings: architecture, history, environment and integrity;⁷ as noted above, these same categories were later adopted for the survey conducted in the development of San Francisco’s Downtown Plan.

The particular form of the Heritage survey was based on a model put forth by Harold Kalman in his book *The Evaluation of Historic Buildings, A Manual*, published by the Canadian government in 1978. Summary ratings from “A” to “D” were assigned to each building on the basis of evaluation in the 13 rating categories: “A”-rated buildings are of Highest Importance, “B”-rated buildings are of Major Importance, “C”-rated buildings are of Contextual Importance, and “D”-rated buildings are of Minor or No Importance. Buildings not rated by Heritage were those that have been built or suffered insensitive exterior remodelings since 1945. The 185 Post Street building was rated “D” - Minor or No Importance in *Splendid Survivors*. The full *Splendid Survivors* description of “D”-rated buildings is as follows:

- D. Minor or No Importance — Buildings which are insignificant examples of architecture by virtue of original design, or more frequently, insensitive remodeling. This category includes vacant buildings and parking lots. Most D-group buildings are “sites of opportunity.”

⁷ The 13 categories are: Architecture (Style, Construction, Age, Architect, Design, Interior); History (Person, Event, Patterns); Environment (Continuity, Setting, Landmark); and Integrity.

1976 Citywide Survey

Between 1974 and 1976, the San Francisco Planning Department conducted a citywide survey of architecturally significant⁸ buildings, rating approximately the best 10 percent of San Francisco's buildings from a low "0" to a high of "5." The inventory assessed the architectural significance of the surveyed structures from the standpoint of overall design and particular design features. Both contemporary and older buildings were included, but historical associations were not considered. Each building was given two numerical ratings, one for architectural quality and one for overall architectural significance, urban design context, and environment significance. (The latter rating is most commonly referred to.) The architectural survey resulted in a listing of the best 10 percent of San Francisco's buildings. In the estimation of the inventory participants, buildings rated "3" or higher represent approximately the best two percent of the City's architecture. The 185 Post Street building was not rated in the 1976 citywide survey.

Unreinforced Masonry Building Ordinance

In 1993, the City adopted the Unreinforced Masonry Building (UMB) Seismic Retrofit Program with the primary goal of reducing earthquake-related life safety hazards associated with the approximately 2,100 UMBs in San Francisco. Buildings strengthened according to the UMB Ordinance are intended to avoid or substantially reduce loss of life and serious injury to occupants due to structural failure in an earthquake, but may not fully comply with current codes for new construction. As a result, even if brought into compliance with the UMB Ordinance, these buildings are nonetheless expected to sustain damage because strengthening in accordance with the UMB Ordinance does not result in structural integrity akin to that of new construction.

Beyond life safety protection, among the other goals of the UMB retrofit program is protection and retention of existing UMBs with architectural merit. The program includes adoption of Architectural Guidelines for retrofit of UMBs. The Planning Code expressly recognizes these guidelines in Section 1111.1, which declares that an alteration of a Significant or Contributory Building under Article 11, or of a building in a conservation district, shall not be considered a Major Alteration if:

The sole purpose and effect of the alteration is to comply with the UMB Seismic Retrofit Ordinances and the Zoning Administrator determines that the proposed work complies with the UMB Retrofit Architectural Design Guidelines. . . .

The San Francisco Department of Building Inspection (DBI) has compiled a list of approximately 2,070 UMBs in the City. Of these, about 1,650 are subject to the UMB Ordinance, which requires that these buildings be seismically strengthened by a deadline (from 1997 to 2006) that is based on the "risk level" to which each building is assigned, or be demolished. Of the 1,650 buildings, about 410 have been

⁸ This use of the word significant in the context of historic architectural resources is to be differentiated from its use under CEQA wherein it denotes an effect that constitutes a substantial adverse change in the environment. Significant, when used in reference to historic architectural resources, denotes a resource's importance.

upgraded and another 335 have been granted permits. Upgrading plans for about 130 additional buildings are under review by DBI. Fifteen buildings have received extensions of time for compliance. About 750 UMBs await action under the ordinance.⁹ About 55 buildings have been demolished.

The 185 Post Street building is a UMB and falls within Risk Level 3, meaning that retrofit must be completed by February 15, 2004, or the building must be demolished. The structure is considered to be a Priority IV building, meaning it is not deemed by the Preservation Community to have high historical/architectural value.

Kearny-Market-Mason-Sutter Conservation District

Purpose and Description

The Downtown Plan, an area plan in the San Francisco General Plan, identified areas of Downtown as having concentrations of buildings worthy of particular recognition as districts.

Certain sections of downtown have concentrations of buildings that together create geographic areas of unique quality. In these areas, buildings of a somewhat lesser quality than those required to be retained take on an increased importance. These buildings help create a setting that reinforces and complements the qualities of the more significant structures in the area, and their own attributes are more apparent and appreciated. (Downtown Plan, p. II.1.25)

The project site is within the Kearny-Market-Mason-Sutter Conservation District, one of six such districts defined under Article 11 of the Planning Code. Article 11 defines conservation districts as areas containing “substantial concentrations of buildings that together create subareas of special architectural and aesthetic importance. Such areas shall contain substantial concentrations of Significant and Contributory Buildings and possess substantial overall architectural, aesthetic or historic qualities justifying additional controls in order to protect and promote those qualities” (Planning Code, Sec. 1103). There is no specified Planning Code criterion for the minimum number or percentage of rated buildings in a conservation district. The designation as a conservation district generally does not restrict uses in buildings within a district; it does, however, impose certain restrictions on a number of changes such as alterations, demolitions, and signage.

The Kearny-Market-Mason-Sutter Conservation District, with 324 buildings at the time of its creation, including 114 Significant (Category I or II) and 140 Contributory (Category IV) structures, is far larger than the City’s other five conservation districts, which contain an average of fewer than 25 structures, about three-quarters of which are Contributory. Since its designation in 1985, the Kearny-Market-Mason-Sutter Conservation District has generally remained intact, having lost no Significant buildings

⁹ The remaining 369 UMBs are exempt from the ordinance for varying reasons: 108 were strengthened prior to adoption of the ordinance; 65 are residential buildings of fewer than five units; 15 are subject to the separate provisions of the Field Act, which governs public school facilities; and 181 buildings on the Department of Building Inspection list of UMBs have been determined to consist of brick infill within steel or concrete frame walls. Information current as of January 31, 1999, as provided by Major & UMB Plan Check Division, San Francisco Department of Building Inspection.

and only two Contributory buildings, meaning that some 78 percent (252 of 322) of the existing remaining buildings are Significant or Contributory.

The existing 185 Post Street building is designated a Category V (Unrated) building within the Conservation District under Article 11 of the Planning Code. The building adjacent to the east of the project site, 171-177 Post Street, is a Category I building, as are the other three buildings on each corner of Grant Avenue and Post Street. The building immediately to the south at 166 Grant Avenue is a Category IV building. There are a number of other Category I buildings clustered within the immediate area (see Figure 10 for map of the District and ratings of nearby buildings).

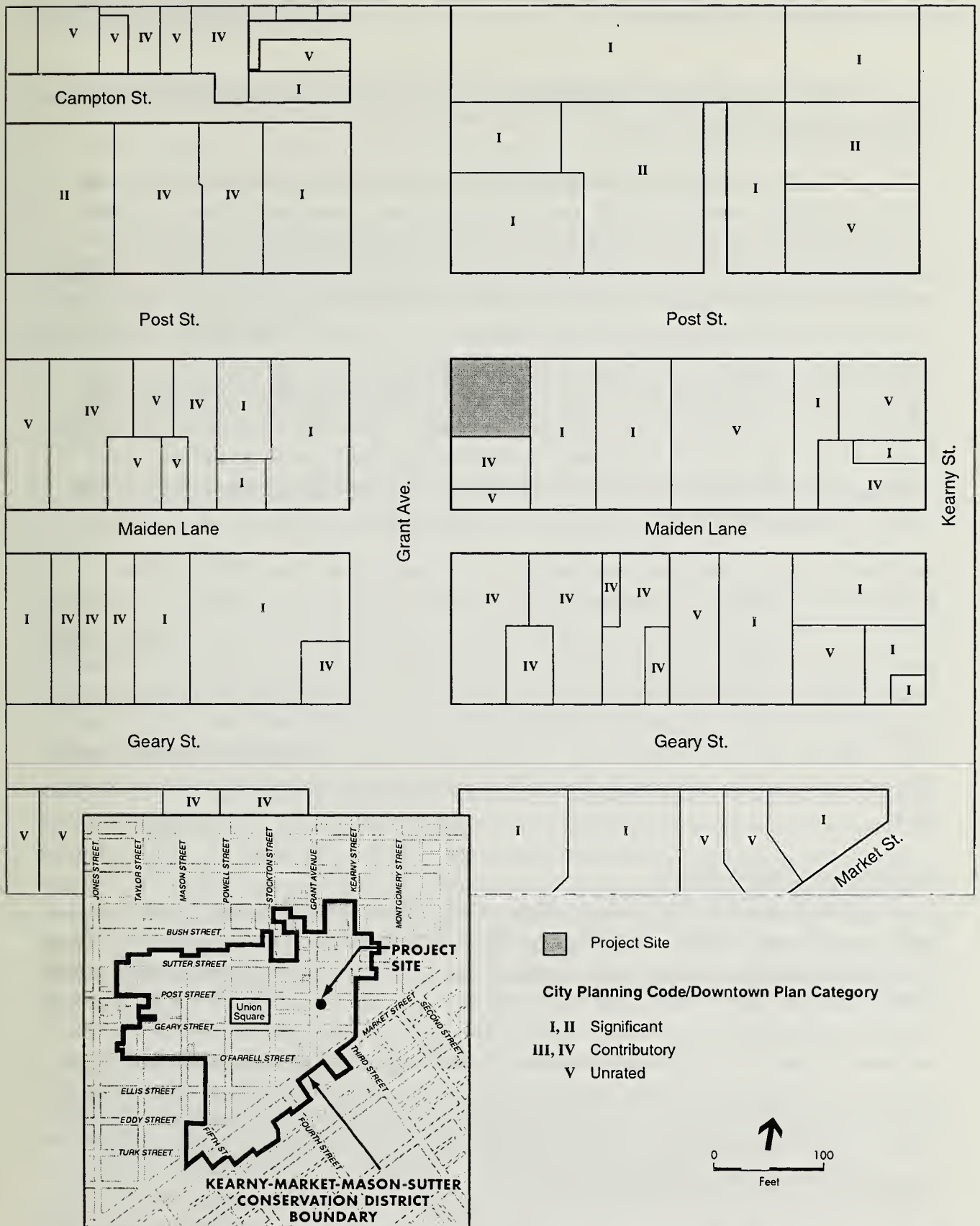
The Kearny-Market-Mason-Sutter Conservation District covers all or part of 36 city blocks, with the retail area around Union Square as its focus. Its name notwithstanding, the District extends west as far as Shannon Alley (between Jones and Taylor Streets), as far north as Pine Street, east to the rear lot lines of some parcels on the east side of Kearny Street, and south across Market Street to Jessie Street to encompass the former Emporium department store building.

Planning Code Article 11, Appendix E, describes the Kearny-Market-Mason-Sutter Conservation District as follows: “The pattern of development is one of small-scaled, light-colored buildings predominantly four to eight stories in height. The height and scale provide for a streetscape which is attractive to the pedestrian because of the comfortable scale and sidewalks. This dense area is the heart of San Francisco's retail and tourist sectors, containing a concentration of fine shops, department stores, theaters, hotels, and restaurants. As such, it is one of the main attractions to tourists from around the country and world, as well as the prime retail district in the Bay Area. The District is further defined by the location of Union Square at its heart. This square is, in many ways, the premier public open space in the City, as well as a primary public forum” (Appendix E, Sec. 5(b)).

The District is characterized by buildings of small to medium scale, typically in two- or three-part vertical composition,¹⁰ with the massing of structures commonly a simple vertically oriented rectangle with a width-to-height ratio of between 1:2 and 1:4. The typical differentiation of the retail base from the remainder of the building gives the District “an intimate scale at the street” (Appendix E, Sec. 6(b)).

Many building facades are divided into bays with widths of from 20 to 30 feet. Building heights typically range from four to eight stories, although there are a number of taller structures, and lots are typically 40 to 80 feet wide. Facade materials include terra cotta, brick, stone, and stucco, with some painted wood and metal window sash and ornament, in light or medium earth tone colors that include white, cream, buff, yellow, and brown. Where there is a supporting structure, masonry is also used to express building mass and weight. Building styles and ornamentation draw on a number of historical sources, primarily Classical and Renaissance, with Gothic and Romanesque detailing also used. Details

¹⁰ Three-part vertical composition means a base, a shaft (middle portion, generally several stories), and a capital (the top-most portion, typically the upper story plus cornice and parapet). A two-part vertical composition includes a base and upper portion only.



SOURCE: Environmental Science Associates

185 Post Street / 200249 ■

Figure 10
Architectural Resources
in the Project Vicinity

include arches, columns, pilasters, projecting cornices, belt courses, lintels and pediments, and decorated spandrels¹¹ (Appendix E, Sec. 6(d)).

Buildings in the Kearny-Market-Mason-Sutter Conservation District feature similarities in style and structural technology, because nearly all were built in the 20 years immediately following the 1906 earthquake and fire, and most were constructed over a period of less than 10 years (Appendix E, Sec. 5(c)). The District contains 11 City Landmarks, all but one of which are also Category I buildings. (The exception is the Frank Lloyd Wright-designed V.C. Morris Building at 140 Maiden Lane, which was too new to be designated Significant or Contributory when Article 11 was adopted.) In addition, two buildings in the District are individually listed in the National Register of Historic Places: the Geary Theater (415 Geary Street; City Landmark No. 82) and the former Hale Brothers Department Store (901 Market Street), both of which are Category I buildings. Around Union Square, the “heart” of the District, new construction since the District was created has somewhat altered the character of this subarea. Of 19 buildings facing Union Square, nearly half are modern and several are larger than the typical buildings in the District.

San Francisco’s best-known retail stores were located on Kearny Street in the 1870s and 1880s. Beginning in the 1880s, major department stores, including the Emporium and Hale Brothers, opened on Market Street. Union Square became a major retail center when the City of Paris store moved to the corner of Geary and Stockton Streets in 1896, where the Neiman Marcus store building now stands. The Union Square/Lower Grant Avenue area has been the City’s premier retail district since the 1920s (Appendix E, Sec. 5(a)). Also within the Kearny-Market-Mason-Sutter Conservation District is the City’s largest concentration of hotels, many of which moved to the area west of Union Square after the 1906 earthquake and fire, led by the St. Francis Hotel, which actually preceded the earthquake by two years.

Guidelines for Project Review

Planning Code Section 1112.2 (Article 11), “Disposition of Applications to Demolish Contributory Buildings and Unrated Buildings in Conservation Districts,” states that an application for demolition of an unrated building located within a conservation district, as is the case of the proposed project, shall be approved if a building or site permit has been issued for a replacement structure on the site. Pursuant to Planning Code Section 1113, “New and Replacement Construction in Conservation Districts,” new or replacement construction must be compatible in scale and design with the Conservation District in which it is located. Guidance for assessing a project’s compatibility with the Kearny-Market-Mason-Sutter Conservation District is provided in Article 11, Appendix E, Section 7, “Standards and Guidelines for Review of New Construction and Certain Alterations.” Below is a brief summary of the relevant guidelines as they relate to the proposed project:

¹¹ A pilaster is a rectangular column that projects outward slightly from the building facade; a belt course is a projecting horizontal line such as that which separates a building base and shaft; a lintel is a horizontal beam above a window or door that supports the structure above; and a pediment is a triangular element above a window or door.

- Composition and Massing: a project should relate to the prevailing height, mass, proportions, rhythm, and composition of existing Significant and Contributory Buildings. New construction should repeat the prevailing pattern of two-and three-part vertical compositions. Additionally, the pattern of buildings constructed to the property line should not be broken.
- Scale: a project should maintain the existing scale of buildings in the vicinity. This may be accomplished through consistent use of size and complexity of detailing as in surrounding buildings, continuance of bay window widths, maintenance of streetwall height, and incorporation of a base element of similar height.
- Materials and Colors: a project should use the preferred surface materials for this district: brick, stone, and concrete (simulated to look like terra cotta or stone). Traditional light colors should be used.
- Detailing and Ornamentation: a project should relate to the surrounding area by picking up elements from surrounding buildings and repeating them or developing them for new purposes.

IMPACTS

SIGNIFICANCE CRITERIA

Planning Code Guidelines

The City has no formally adopted significance standards for potential impacts on historic architectural resources. However, projects are normally found to have a significant effect on the environment if they would substantially disrupt or adversely affect the historic significance of a property or substantially conflict with the preservation of buildings or districts subject to the provisions of Article 10 or Article 11 of the San Francisco Planning Code. The proposed project would be subject to Article 11, and would be evaluated relative to the guidelines of Article 11, Appendix E, Section 7, as discussed above. Therefore, projects that would substantially conflict with such guidelines would be considered to have a significant effect on the environment.

CEQA: Substantial Adverse Change

Additionally, CEQA Section 21084.1 states that “a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” A “substantial adverse change” is defined by CEQA Guidelines Section 15064.5 as “demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” CEQA Guidelines Section 15064.5(b)(2) states that the significance of a historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical

resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion” on an historical resource list.

A “historical resource” is defined as one that is listed in, or determined eligible for listing in, the California Register of Historical Resources. In addition, a resource that (i) is identified as significant in a local register of historical resources, such as Article 10 and Article 11 of the San Francisco Planning Code, or (ii) is deemed significant due to its identification in an historical resources survey meeting the requirements of Public Resources Code Section 5024.1(g), is presumed to be historically significant unless a preponderance of evidence demonstrates otherwise. Finally, CEQA Section 21084.1 permits a lead agency to determine that a resource constitutes a historical resource even if the resource does not meet the foregoing criteria.

In the case of the proposed project, the existing building proposed to be demolished has no historic value, and is not a historical resource. The historical resource is the Kearny-Market-Mason-Sutter Conservation District. As such, the analysis will determine whether, by implementation of the proposed project, the physical characteristics that convey the District’s significance would be materially impaired.

IMPACT ASSESSMENT

As the existing building proposed for demolition is not an historical resource, the historic architectural resources impact assessment in this EIR focuses on the project’s effects upon the Kearny-Market-Mason-Sutter Conservation District. The Kearny-Market-Mason Sutter Conservation District (District) appears to qualify as an historical resource under CEQA because of its inclusion in a local register of historical resources (*i.e.*, Planning Code Article 11). Therefore, the question arises whether the demolition and new construction of the 185 Post Street building would have a significant impact on the Conservation District. This evaluation considers both significance criteria discussed above: (1) substantial conflicts with the Planning Code guidelines for determining compatibility with the District, and (2) substantial adverse change to an historical resource as defined by CEQA.

Planning Code Guidelines

Demolition of 185 Post Street Building

As discussed, Planning Code Section 1112.2 (Article 11), “Disposition of Applications to Demolish Contributory Buildings and Unrated Buildings in Conservation Districts,” states that an application for demolition of an unrated building located within a conservation district, as is the case of the proposed project, shall be approved if a building or site permit has been issued for a replacement structure on the site. As there are no other standards for demolition of an unrated building within a Conservation District, the proposed project would be consistent with this provision of the Code, and demolition of the 185 Post Street building would be a less-than-significant impact.

New Construction of Proposed Project

Following is an analysis of the project's compatibility with the District in view of the guidelines established in Article 11, Appendix E, Section 7, "Standards and Guidelines for Review of New Construction and Certain Alterations."

Massing and Composition

Section 7(b)(1) of Appendix E states that new construction should maintain the District's essential character by "relating to the prevailing height, mass, proportions, rhythm and composition of existing Significant and Contributory Buildings." With regard to height, Significant and Contributory buildings within the project vicinity vary widely. The Significant and Contributory buildings adjacent to the project site on Post Street and Grant Avenue, and on each corner parcel of Post Street and Grant Avenue opposite the project site, range from three to twelve stories. The proposed ten-story, 130-foot building would be slightly taller than the adjacent building to the east on Post Street (approximately 120 feet tall), and would be shorter than the building across Grant Avenue to the west (approximately 170 feet tall). Prevailing heights in the broader area range from four to eight stories, although there are a number of taller buildings in the District. The proposed project would be within the range of existing building heights.

Mass is a function of both building height and width. Lot widths in the immediate area range from about 20 feet to 122 feet, and existing buildings are built to their property lines, generally with no upper story setbacks. The proposed project would be built to its property lines for the full height of the building. As the project site is relatively small, at a width of about 60 feet each along Post and Grant, the massing would be in keeping with Significant and Contributory buildings in the District. Thus, the proposed project would be compatible with the District in terms of mass.

Building proportion refers to the relationship of size between pieces of a building. Section 7(b)(1) states that standard proportions of new buildings should be established by the prevailing streetwall height and widths of lots, and that it may be necessary to divide the facades of new buildings into smaller sections that relate to those existing proportions. In this way, a building's proportions are closely related to composition, discussed below. As indicated, building heights of Significant and Contributory buildings in the vicinity vary, as do lot widths. The proposed building would not be excessively tall relative to its lot width (a width-to-height ratio of about 1:2.2). Other Significant and Contributory buildings in the immediate vicinity have width-to-height ratios that range from about 1:1 to 1:4. As such, the overall building dimensions would be suitably proportioned and would be consistent with the proportions of Significant and Contributory buildings in the vicinity.

With regard to a building's composition, Section 7(b)(1) states that the design of a new structure should repeat the prevailing pattern of two- and three-part vertical compositions, and further states that a base element is necessary to define the pedestrian environment. Two- or three-part vertical compositions consist of either (1) a base and a shaft, or (2) a base, shaft, and capital. Base elements may be distinguished from the upper levels of a building by a change of material or by a strong horizontal

element such as a cornice. In either case, the visual distinction between the base and upper levels of a building is clear. The bases of Significant and Contributory buildings in the area are one or more stories. In proportion to building height, bases typically occupy the bottom one-quarter or one-third of the building. In two-part vertical compositions, the upper levels, or shaft typically occupy two-thirds or three-quarters of the overall building height. In three-part vertical compositions, the top levels, or capital, typically occupy about one-third or one-quarter of the overall building height.

The proposed project would appear to be visually divided into three vertical portions. The base would consist of a glass-enclosed ground level with storefront display windows, reception area and entrances. The upper levels would be divided into two portions roughly equal in height (separated by the sixth-floor metallic screen treatment). While three vertical elements would be present in the proposed design, each element would not be in the proportions characteristic of the District, as discussed above. The base would be disproportionately low in height relative to the overall height of the building, about one-tenth of the building height rather than the one-quarter or one-third of the building height as in most Significant and Contributory buildings in the District. The two upper elements would not correspond to the proportions of shaft and capital, as noted above. Therefore, while the proposed project could be considered to be a contemporary interpretation of a three-part vertical composition, it would not be consistent with the prevailing pattern of other Significant and Contributory buildings with respect to composition.

Section 7(b)(1) also notes that most existing buildings are built to the property or street line, and that this pattern should not be broken. The proposed project would be consistent with this guideline. As discussed above, the proposed building would be constructed to the street line, and at the glass-enclosed ground level, storefront display space, a reception area, lobby and entry openings would be incorporated into the design.

A building's rhythm refers to the regular recurrence of building elements. The proposed project's beam-and-column grid structure would be expressed by the articulation on the structural stainless steel skin and the building's facades would be broken into vertical "bays"¹² typically 18 feet wide, similar to the Significant and Contributory buildings in the area. The rhythm of these proposed bays would be compatible with, although somewhat less orderly or predictable than, the rhythms of most existing buildings in the District.

Scale

Section 7(b)(2) indicates that a major influence on scale is the degree to which the entire façade plane is broken into smaller elements that relate to human scale. The guidelines state that the "existing scale of the buildings in the vicinity should be maintained. This can be accomplished in a variety of ways, including: a consistent use of size and complexity of detailing in regards to surrounding buildings, continuance of existing bay widths, maintenance of an existing streetwall height, and incorporation of a

¹² A bay is a vertical element of the composition of a building wall contained between two vertical bands such as piers, columns, or pilasters.

base element (of similar height) to maintain the pedestrian environment. Large wall surfaces, which increase a building's scale, should be broken up through the use of detailing and textural variation."

The proposed building would include a base element that would relate to human scale and provide pedestrian interest at street level. The proposed streetwall height would be within the range of heights of Significant and Contributory buildings in the District. Additionally, the upper levels would incorporate a regular rhythm of bays that would be consistent with other buildings in the District. Detailing and textural variation of the upper level façades would be in the form of small circular perforations and protrusions, or disks, within the structural metal skin. Overall, the project's scale would be consistent with other buildings within the District.

Materials and Colors

Section 7(b)(3) states that the "preferred surface materials for this district are brick, stone, and concrete (simulated to look like terra cotta or stone)," that "texture of surfaces can be treated in a manner so as to emphasize the bearing function of the material..." and that "(t)raditional light colors should be used in order to blend in with the character of the district."

The proposed project's façade would consist of a structural stainless steel exterior skin supported on a grid beam-and-column structure. The proposed building would also include the limited use of travertine on walls visible from Post Street and Grant Avenue and from within the ground floor. According to the project sponsor, the stainless steel façade would be tinged with the colors of the neighboring buildings without actually reflecting them, and would allow the façade to change as the light qualities of its neighbors change. Although the texture of the building's facades would not be "treated" to emphasize the function of the material, the building's skin would reveal the load bearing beams and columns behind it. While not actually matching them, the matte-finish stainless steel color of the proposed façade would likely blend in with Significant or Contributory buildings in the vicinity and therefore would be consistent with the guidelines. However, stainless steel is not a preferred surface material, and its use in the District as a façade material is generally limited. The use of stainless steel, particularly in the manner proposed covering almost the entirety of surface area of the facades, would be inconsistent with the guidelines.

Detailing and Ornamentation

Section 7(b)(4) states that the District has one of the largest collections of finely ornamented buildings in the City, and that these buildings should be used as references for new construction. This section states "Detailing of a similar shape and placement can be used without directly copying historical ornament. The new structure should incorporate prevailing cornice lines or belt courses and may also use a modern vernacular instead of that of the original model."

Detailing and ornamentation of the proposed project would consist of small circular openings and raised disks on the stainless steel façade. The façade would be constructed of a one-inch layer of stainless steel with a beadblast finish, backed by a layer of foil-faced glass insulation and a layer of polycarbonate panels. The circular openings would vary in diameter from 2.5 to 7.5 inches, would be 5-6 inches in

depth, and would be composed in a pattern that, according to the project architects, would create hierarchy across the overall elevation. Openings would be filled with circular plugs of either stone or glass, set flush with the face of the steel. Layers of material, such as the insulation and panels noted above, and possibly tinted foam, would be visible through the openings. The relief pattern on the stainless steel skin would consist of raised disks, some of which would be hollowed out to act as air intake louvers for the mechanical systems of the building.

As indicated, existing Significant and Contributory buildings in the District should be used as reference, but detailing and ornamentation of new construction need not replicate historical ornament. Existing Significant and Contributory buildings in the District are layered with architectural ornament derived from traditional Classical, Renaissance, Gothic and Romanesque styles. These richly detailed layers provide added depth and relief to building facades. The project architects have sought to incorporate layers into the proposed design, utilizing modern material and innovative construction techniques, without copying historical detailing. The design is finely detailed and textured, incorporating circular holes and raised disks of a range of sizes, and allowing for the reading of interior diffuse light.

The guidelines for compatibility with detailing and ornamentation are broadly written, and therefore may be broadly interpreted. Detailing and ornamentation of the proposed design appears to achieve the same benefits of visual depth, light and shadow play as do existing Significant and Contributory buildings in the District. On the whole, given the above analysis, the proposed detailing and ornamentation appears to be consistent with the guidelines.

CEQA: Substantial Adverse Change

As discussed, a “substantial adverse change” is defined by CEQA Guidelines Section 15064.5 as “demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” CEQA Guidelines Section 15064.5(b)(2) states that the significance of a historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion” on an historical resource list. The analysis of the proposed demolition and new construction relative to this standard is provided below.

Demolition of 185 Post Street Building

The loss of the 185 Post Street building would not adversely affect the Kearny-Market-Mason Sutter Conservation District such that the significance of the Conservation District would be materially impaired. As stated in the Setting, the Conservation District covers all or parts of 36 city blocks. The District retains all of the 114 Significant (Category I or II) and all but two of the 140 Contributory (Category IV) structures that existed at the time of its designation in 1985; some 78 percent (252 of 322) of the existing remaining buildings are Significant or Contributory. The existing 185 Post Street building is designated Category V – Unrated Building, is rated D – Minor or No Importance on the Heritage

Survey. In view of the above, the demolition of the 185 Post Street building would not result in a significant effect on the Kearny-Market-Mason Sutter Conservation District.

New Construction of Proposed Project

The proposed project would replace the existing 88-foot tall Non-Contributory building with a 130-foot tall Non-Contributory building of the same horizontal dimensions, but of a more contemporary design. The existing building on the project site was there at the time the District was established and has not subsequently resulted in a “material impairment” of the District such that its eligibility as an historic resource has been undermined. Thus, a determination of the potential for a “substantial adverse change” to the District (an historic resource) resulting from construction of the proposed project must be based on the potential incremental adverse effect of the proposed building relative to that of the existing building on the site. Stated another way, this analysis must determine whether construction of the proposed new building would potentially have such a greater adverse effect on the District than the existing building that the “net new” change would be enough to “materially alter” the physical characteristics of the District that convey its historical significance and that justify its inclusion in an historical resource list.

The proposed project would result in an approximately 40-foot height increase over the existing building. As discussed above, this increase would be in keeping with the heights of the District and immediately surrounding buildings. Similarly, as discussed above, the proposed building’s massing, scale, and rhythm would not change dramatically from the existing building and would not be incompatible with the Significant and Contributory buildings of the District.

The proposed project’s Modern aesthetic, including its use of materials and ornamentation, would be a substantial departure from the existing building. Given its unique appearance, the proposed project would visually contrast with the immediately adjacent structures, most of which are Significant buildings, as well as with other nearby buildings of more traditional design. Although Modern buildings and older buildings with some contemporary features are present within the District, the distinctive proposed structure, compared to the existing building, would draw greater attention to itself. As architectural taste is highly subjective and varies amongst viewers, it is likely that there would be disagreement whether the prominence of this unique building has a positive or negative effect. As such, it cannot be concluded that the proposed project would inherently or necessarily detract more from the District than does the existing building (or no building on the site for that matter).

While the character of the corner of Post Street and Grant Avenue would change somewhat with the introduction of the proposed project, the District as a whole, given its size, would not be substantially affected. As discussed, the District is relatively large, covering all or part of 36 city blocks, and extending as far west as Shannon Alley (between Jones and Taylor Streets), as far north as Pine Street, as far east as Kearny Street, and south across Market Street. As noted above, some 78 percent (252 of 322) of the existing buildings in the District are Significant or Contributory, which would not change with the proposed project. The physical characteristics that give the District its significance would not be lost or greatly diminished, and would not cause the District to be ineligible as a historical resource. Therefore,

the proposed project would not result in a substantial adverse change to the District, and would not adversely affect the District such that its significance would be materially impaired.

Conclusion

While the proposed project would be consistent with Article 11, Appendix E, Section 7 standards for new construction with respect to building height, mass, scale, vertical rhythm, detailing, and ornamentation, the project would conflict with standards relating to the building's overall composition and surface material. Determinations regarding consistency with architectural design guidelines are inherently subjective. Nonetheless, based on the above analysis, it is concluded that the proposed project would substantially conflict with Planning Code guidelines established to preserve the character of the District, and that the project would therefore result in a significant impact upon the Kearny-Market-Mason-Sutter Conservation District.

Given the size of the Kearny-Market-Mason-Sutter Conservation District, and given that most of its buildings and its character remains intact from the time it was created, the proposed project would not result in a substantial adverse change, as defined under CEQA, to the District, and would not adversely affect the District such that its significance would be materially impaired.

It should be noted that the Planning Commission, in considering whether to approve the proposed project, would be required to consider the project's consistency with Article 11, Appendix E, Section 7 standards. The project could not be approved unless it were found to be consistent with such standards, and the Planning Commission could request modifications of the building design as appropriate. In addition, the project must be found, on balance, consistent with the *General Plan*, including the Downtown Plan, an element of the *General Plan*.

Cumulative Impacts

The Planning Department has reviewed an application for another project that would demolish a Category IV building in the Kearny-Market-Mason-Sutter Conservation District, at 116-124 Maiden Lane (Case No. 98.833E). The Department has also approved the proposed Yerba Buena Redevelopment Project Area Expansion/Emporium Site Development (Case No. 98.090E), which would demolish most of the Emporium Building on Market Street, a Category I structure in the Conservation District (although the principal Market Street facade of the building would be retained, as would its dome and a portion of the rotunda). Additionally, a Category IV building at 125-159 Geary Street was recently demolished as part of the Neiman Marcus Expansion project (Case No. 98.813). Considering these other projects, the District would continue to retain most of its buildings and its character intact from the time it was created. Therefore, no significant cumulative effect upon the District would occur.

C. VISUAL QUALITY

SETTING

The project site is within a densely built area within Downtown San Francisco. Visual characteristics of the area include historic buildings of the traditional Classical, Renaissance, Gothic and Romanesque styles of varying import, intermixed with an array of somewhat more modern buildings. Prevailing building heights range from about four to eight stories, although there are a number of taller structures.

The project site is occupied by a vacant six-story building, clad in white masonry tile with a regular pattern of metal-framed windows. Buildings immediately adjacent consist of Significant (Category I) buildings to the east, north, and west, ranging from about four to twelve stories. The adjacent Contributory (Category IV) building to the south is three stories. While the project site is within the Kearny-Market-Mason-Sutter Conservation District, many buildings, particularly high-rises, from outside of the Conservation District, are clearly visible from the project site and its immediate environs. Looking southward on Grant Avenue, the under-construction Four Seasons Hotel is visually prominent, consisting of a steel and glass edifice of over 35 stories. Looking eastward down Post Street, a number of high-rises within one to two blocks visually dominate.

IMPACTS

SIGNIFICANCE CRITERIA

San Francisco has no formally adopted significance criteria regarding visual quality and urban design. As prescribed by Appendix G of the *CEQA Guidelines*, the project would have a significant effect on the environment if it would:

- substantially degrade or obstruct publicly accessible scenic views;
- substantially degrade the existing visual character or quality of the area, or result in a substantial, demonstrable negative aesthetic effect; or
- generate obtrusive light or glare that would adversely affect views or substantially affect other properties.

IMPACTS ASSESSMENT

The proposed project would result in a visual change since it would demolish an existing six-story building dating from 1908 and construct a new ten-story building in its place. The proposed structure would differ visually from the existing structure in a number of ways. (Photographs of existing conditions and corresponding photosimulations of what the proposed project would look like are

provided below to demonstrate the visual changes that would occur on the site (see Figures 11-16.)

First, while the proposed project would have the same plan dimensions as the existing structure, it would be more than 40 feet taller (130 versus 88 feet). As such, the proposed project would rise an additional 40 feet over the buildings adjacent to the project site to the east (approximately 120 feet tall) and to the south (approximately 58 tall).

Second, while the existing building is a solid rectangular mass that has continuous street walls flush with the property line, the proposed project would be visually composed of two masses separated with visual breaks in the streetwall at the first and sixth levels. The ground-floor level would be almost entirely glass while the sixth level would be enclosed by a non-structural metallic screen.

Third, the proposed project would have a distinctive architectural design that would differ substantially from the existing building. The proposed building's primary design feature would be a stainless steel structural skin that would cover the entire exterior of the structure's Grant Avenue and Post Street facades and bear a substantial portion of the building's structural load. The stainless steel skin with a matte-finish would be perforated with circular windows of varying size, through which a palette of interior façade materials of varying translucency and color would be seen. The proposed material and treatment of the building's façades would be a substantial departure from the existing building and most of the surrounding buildings.

The proposed project would likely increase the amount of light emitted from the site as a result of the increased intensity of use of the site (i.e., a larger building with more people using the site), but would not substantially increase ambient light levels in the project area. Further, light and glare produced from the proposed building would be typical of office and retail structures nearby and throughout the City. The unique façade design of small circular windows would tend to reduce the amount of light emitted from the interior compared to typically larger windows, as would the low-reflectivity glass proposed for the ground floor. The proposed project would not produce obtrusive glare that would substantially affect other properties and would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. The proposed stainless steel façade would be of a matte finish. Thus, the project would not produce substantial light or glare affecting other properties.

The proposed project would be constructed within a densely built area in Downtown San Francisco. The project would not fundamentally differ from the streetwall scale or mass of the existing building on the project site. The proposed project would be of a unique modern design that, due to its form, detailing, and materials would make it visually prominent, especially given its highly visible location at the intersection of Post Street and Grant Avenue near Union Square. From views of the project site from the corner of Post Street and Grant Avenue, the proposed project would visually contrast with the historic buildings of traditional styles in the immediate area. However, other modern buildings and older structures that have been remodeled exist within about two blocks away and beyond, and viewing the project site from a farther distance of a block or more, the proposed project would generally tend to be seen within the context of a broader range of building sizes and styles.



Figure 11
South on Grant Avenue
Existing View

SOURCE: OMA



Figure 12
South on Grant Avenue
Photosimulation

SOURCE: OMA



Figure 13
East on Post Street
Existing View

SOURCE: OMA



Figure 14

East on Post Street
Photosimulation

BURBERRY

201 POST

201 POST

TARDEN

LOW-AWAY
NO STOPPING
7 AM - 9 AM
4 PM - 6 PM

PARKING
2 - 6 PM
WED-FRI

SOURCE: OMA



Figure 16

Post Street Corner
Photosimulation

As discussed with regards to historic architectural resources, architectural taste is highly subjective and different viewers would have varying opinions as to whether the proposed project makes a positive or negative contribution to the visual landscape of the neighborhood. As such, although the project would be architecturally unique and would draw attention to itself, if for no other reason than it being different than most of the surrounding buildings, there is nothing about the proposed design that would inherently result in a negative aesthetic effect. Thus, the proposed project would not result in a substantial, demonstrable negative aesthetic effect or substantially degrade the existing visual character or quality of the site and its surroundings. (See Section III.B, Historic Architectural Resources, for an analysis of the proposed project's potential effects on historic architectural resources).

The Initial Study determined that the proposed project would not significantly affect scenic vistas or views. Although the additional height would be visible from surrounding buildings and from mid-range ground-level vantage points, including locations near Union Square, the project would not obstruct any publicly accessible scenic views or vistas, as discussed in the Initial Study.

D. GROWTH INDUCEMENT

In general, a project would be considered growth-inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project were not approved and implemented. The proposed project, as an office/retail store, would not be expected to substantially alter development patterns in Downtown or elsewhere in San Francisco. The introduction of 4,400 sq. ft. of office space, 6,800 sq. ft. of retail space, 1,500 sq. ft. of showroom space, 1,700 sq. ft. of residential space, 2,250 sq. ft. of open space, and 22,650 sq. ft. of other space to the project site, currently occupied by a vacant building that formerly provided 26,200 square feet of office and retail space, would not generate substantial population growth or concentration in the neighborhood, city or region. Located in an urban area, the project would not necessitate or induce the extension of municipal infrastructure. In view of the above, there is no reason to believe that the project would result in additional development in the project site vicinity that would not otherwise occur.

CHAPTER IV

MITIGATION MEASURES PROPOSED TO MINIMIZE THE POTENTIAL ADVERSE IMPACTS OF THE PROJECT

In the course of project planning and design, measures have been identified that would reduce or eliminate potential significant environmental impacts of the proposed project. Some of these measures have been, or would be, voluntarily adopted by the project sponsor or project architect and contractor and thus are proposed by the project sponsor; some are identified by this EIR. Implementation of some may be the responsibility of other agencies. Measures identified by this EIR or those that may have been rejected by the project sponsor may be required by the Planning Commission as conditions of project approval, if the project were to be approved. Each mitigation measure and its status are discussed below.

There are several items required by law that would serve to mitigate potential significant impacts; they are summarized here for informational purposes. These measures include: no use of mirrored glass on the building to reduce glare, as per City Planning Commission Resolution 9212; limitation of construction-related noise levels, pursuant to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code, 1972); compliance with Chapter 36 of the San Francisco Building Code, Work Practices for Exterior Lead-Based Paint; and observance of State and federal OSHA safety requirements related to handling and disposal of other hazardous materials, such as asbestos.

Measures that are not required by legislation but would serve to mitigate significant environmental impacts appear below. Mitigation measures preceded by an asterisk (*) are from the Initial Study (see Appendix A).

A. CONSTRUCTION AIR QUALITY

- *A.1 The project sponsor would require the contractor(s) to sprinkle the project site with water during demolition, excavation and construction activity; sprinkle unpaved exterior construction areas with water at least twice per day, or as necessary; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during demolition and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose.

B. GEOLOGY

- *B.1 Geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsor and contractor would follow the recommendations of the final geotechnical report(s) regarding any excavation and construction for the project. The project sponsor would ensure that the construction contractor would conduct a pre-construction survey of existing conditions and would monitor adjacent building(s) for damage during construction.

C. HAZARDS

*C.1

- a. To ensure that workers and the public are not exposed to any potential hazardous materials that may exist in the soil to be excavated, the construction contractor would ensure that workers who are exposed to soil contact wear rubber gloves. In addition, the contractor would ensure that soil disturbed through grading be contained within the immediate area by means such as washing workers' shoes and washing earthmoving equipment (using recycled water as described in Mitigation Measure No. 1) prior to workers and equipment leaving the area where grading occurs. Other dust control measures included in Mitigation Measure No. 1 would also serve to prevent the dispersion of potentially contaminated soil.
- b. The project sponsor would ensure that building surveys for PCB-containing equipment (including elevator equipment), hydraulic oils, fluorescent lights, and lead-based paint are performed prior to the start of renovation. Hazardous materials discovered during these surveys would be abated according to federal, State, and local laws and regulations. Asbestos-containing materials would be removed and disposed of or encapsulated prior to renovation and reuse of the building. Interior asbestos-containing materials would be removed as part of the project. All asbestos abatement and encapsulation procedures would be performed in accordance with applicable federal and State guidelines. Equipment identified as containing PCB oils would be removed and properly disposed. Construction and renovation activities that disturb exterior surfaces containing lead-based paint would comply with Chapter 36 of the San Francisco Building Code for the identification, safe work practices, proper removal methods, and notification.

D. ARCHAEOLOGICAL RESOURCES

- *D.1 Should evidence of archaeological resources of potential significance be found during ground disturbance, the project sponsor would immediately notify the Environmental Review Officer (ERO) and would suspend any excavation which the ERO determined could damage such archaeological resources. Excavation or construction activities which might damage discovered cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the project sponsor would select an archaeologist to assist the Office of Environmental Review in determining the significance of the find. The archaeologist would prepare a draft report containing an assessment of the potential significance of the find and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO would recommend specific additional mitigation measures to be implemented by the project sponsor.

Mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of cultural materials. Finally, the archaeologist would prepare a draft report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report(s) would be sent by the archaeologist directly to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center. Three copies of the final archaeology report(s) shall be submitted to the Office of Environmental Review, accompanied by copies of the transmittals documenting its distribution to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center.

CHAPTER V

SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with Section 21067 of the California Environmental Quality Act (CEQA), and with Sections 15040, 15081 and 15082 of the State CEQA Guidelines, the purpose of this chapter is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the project, or by other mitigation measures that could be implemented, as described in Chapter IV, Mitigation Measures, pp. 53-55.

This chapter is subject to final determination by the Planning Commission as part of its certification process for the EIR. The Final EIR will be revised, if necessary, to reflect the findings of the Commission.

With the implementation of the mitigation measures outlined in Chapter IV, Mitigation Measures, pp. 53-55, all potential significant impacts would be reduced to a less-than-significant level, with the following exception.

Construction of the proposed building as currently designed would not be compatible with Article 11, Appendix E, Section 7, "Standards and Guidelines for Review of New Construction and Certain Alterations" for the Kearney-Market-Mason-Sutter Conservation District. While the proposed project would be compatible with most of the guidelines for the District, the project would not be compatible with the guidelines regarding building composition and materials. Because the proposed project would substantially conflict with the guidelines, the project would be considered to have a significant effect on the environment.

CHAPTER VI

ALTERNATIVES TO THE PROPOSED PROJECT

This chapter identifies alternatives to the proposed Project and discusses the environmental impacts associated with each alternative. City decision-makers could adopt any of the following alternatives, if feasible, instead of approving the proposed project.

The alternatives described in this chapter include a No Project Alternative, as required by CEQA Guidelines Section 15126.6(e), and an alternative that would avoid or lessen the proposed project's significant adverse effect on historic architectural resources, by constructing a building consistent with Article 11 standards for new construction within the District, while at the same time attempting to at least partially achieve the project sponsor's basic objectives (CEQA Guidelines, Section 15126.6(c)). The degree to which each alternative "avoids or substantially lessens" the project's significant impact on historic architectural resources and the degree to which the alternative meets the project sponsor's objectives will be considered by the City decision-makers in their consideration of the proposed project.

A. ALTERNATIVE A: NO PROJECT

DESCRIPTION

This alternative would entail no change to the site, which would remain in its existing condition. As the 185 Post Street building would not be demolished, no new construction would occur.

IMPACTS

This alternative would not result in immediate demolition of the 185 Post Street building, a Category V (unrated) building under Article 11 of the Planning Code, and would not immediately result in the construction of a new building within the Kearny-Market-Mason-Sutter Conservation District, a historical resource under CEQA. As described in Section III.B, Historic Architectural Resources, the existing 185 Post Street building must, under the City's Unreinforced Masonry Building (UMB) Ordinance, be retrofitted by 2004, or be demolished. Any subsequently proposed demolition and new construction would be subject to separate environmental review. However, upgrading pursuant to the UMB Ordinance does not typically trigger CEQA review. As an unreinforced masonry structure, without seismic upgrade, the existing building would remain a potential safety hazard, whereas the proposed building would be constructed to meet current building code requirements for seismic safety.

Unless the 185 Post Street building were upgraded to accommodate other tenants or demolished pursuant to the UMB Ordinance, there would be no temporary construction impacts, such as noise, dust and construction traffic. Unless the building were upgraded to accommodate other tenants, this alternative would not result in any increase in travel to and from the project site, nor would it cause any of the impacts described in the Initial Study, such as a minor increase in shadow on Post Street.

The 185 Post Street building contains a total of approximately 26,200 square feet with its six floors. In the past, the building contained about 15,400 square feet of retail space and 10,800 square feet of office space. However, the building is currently vacant. Reoccupancy of this building, either before or after seismic upgrade pursuant to the UMB Ordinance, would generate incrementally greater traffic and air pollutant emissions, compared to existing conditions. Seismic upgrade, should it occur, could be undertaken by the project sponsor or by a subsequent owner. However, whether such occupancy or seismic upgrade would occur is purely speculative.

Because, as an existing structure, the 185 Post building is not required to comply with the Planning Code's compatibility guidelines for the Conservation District, the No Project Alternative would technically avoid the proposed project's inconsistency with the standards of Planning Code Article 11, Appendix E, Section 7 relating to the Kearny-Market-Mason-Sutter Conservation District. However, with respect to impacts on the Kearny-Market-Mason-Sutter Conservation District, unless the existing building was redesigned as part of a seismic upgrading, the No Project Alternative would likely have similar effects as the proposed project. This would be the case because, like the proposed project, the No Project Alternative would result in a building that is non-contributory to the District and is not wholly compatible with the District's Planning Code guidelines, occupying the site. Further, The No Project Alternative would not meet any of the project sponsor's objectives.

B. ALTERNATIVE B: DESIGN GUIDELINE-COMPLIANT

DESCRIPTION

Under this alternative, a new building of the same size, height, width, mix of uses, and internal layout as the proposed project would be constructed. However, where the proposed project fails to comply with the standards of Article 11, Appendix E, Section 7 for compatibility with the Kearny-Market-Mason-Sutter Conservation District, this alternative would be designed to achieve consistency with the standards. The façade would be clad with masonry, and would contain rectangular windows recessed from the building face. A belt course would extend across the façade of the building above the second level, defining a base. Another horizontal element, a cornice, would extend across the façade above the eighth level separating the shaft and capital.

IMPACTS

This alternative would avoid the impacts of the proposed project resulting from new construction of the 185 Post Street building in a manner inconsistent with guidelines of Article 11, Appendix E, Section 7 of the Kearny-Market-Mason-Sutter Conservation District, deemed to be an historical resource under CEQA.

This alternative would be of the same height, mass, and dimensions as the proposed project, and would be consistent with the guidelines with respect to these building characteristics, as would the proposed project. This alternative would have a clear base element, shaft and capital, consistent with the standard to provide a two- or three-part vertical composition, and such elements would be of similar proportions as the prevailing pattern of such compositions in the District. This alternative would be constructed to the street property line, compatible with the guidelines, as would the proposed project. Divisions along the building façade, including the base element and windows, would relate this alternative to human scale, as would the proposed project. Masonry surface material of a light color would be used with this alternative, consistent with the preferred surface materials noted in the guidelines. As discussed, building details and ornamentation would include recessed rectangular windows, a belt course, and a cornice, consistent with traditional ornamentation prevalent in the District. As such, this alternative would comply with the standards for new construction within the District, and would have a less-than-significant effect upon the Kearny-Market-Mason-Sutter Conservation District.

Because this alternative would result in the same amount of floor space compared to the proposed project, transportation and related air-quality impacts would be the same less-than-significant effects as with the proposed project. As the building envelope under this alternative would not change, shadow effects would be less-than-significant, as with the proposed project.

Temporary construction impacts associated with the proposed project, such as noise, dust and construction traffic, would occur under this alternative, because this alternative would involve similar construction activities at the project site. Other effects described in the Initial Study related to the intensity of development (*e.g.*, increases in employment) would be the same as with the proposed project.

This alternative would likely¹³ not meet most of the project sponsor's objectives related to the building's design. Specifically, the Design Guideline-Compliant Alternative would likely not achieve the sponsor's objectives to: create "...a world-class piece of architecture...", "...create a world-renowned architectural signature in San Francisco...", "...pioneer the use of novel state-of-the-art seismic technology," or "...allow the façade to express the lateral (seismic) and vertical (gravity) structure..."

¹³ Since no specific design for this alternative has been prepared, a determination of precisely which design-related objectives would not be achieved is impossible to determine.

CHAPTER VII

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Attn: Nandini N. Shridhar

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CHAPTER VIII

APPENDICES

APPENDIX A: Initial Study

APPENDIX B: Building Design Details

APPENDIX C: Vertical and Horizontal Rhythm Comparison

APPENDIX A

INITIAL STUDY

**NOTICE THAT AN
ENVIRONMENTAL IMPACT REPORT
IS DETERMINED TO BE REQUIRED**

Date of this Notice: December 23, 2000

Lead Agency: City and County of San Francisco, Planning Department
1660 Mission Street, San Francisco, CA 94103

Agency Contact Person: Irene Nishimura

Telephone: (415) 558-5967

Project Title: 00.272E: 185 Post Street
(Prada Retail Store, Offices, and Residential Unit) **Project Sponsor:** I.P.I. USA Corp
Contact Person: Joel Yodowitz

Project Address: 185 Post Street
Assessor's Block and Lot: Block 310, Lot 18
City and County: San Francisco

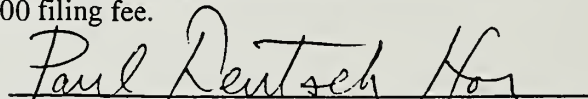
Project Description: The project would consist of demolition of an existing vacant six-story, 88-foot high office/retail building at 185 Post Street and construction of a new ten-story-plus-basement, 130-foot tall office/retail/residential building to serve as the West Coast headquarters of Prada USA. Total new construction would be about 39,300 square feet. The 3,600 square-foot project site is located at the southeast corner of Post Street and Grant Avenue, one block east of Union Square, and is within the C-3-R (Downtown Retail) District, 80-130-F Height and Bulk District, and Kearny-Market-Mason-Sutter Conservation District. The building proposed for demolition is designated as a Category V (Unrated) building and does not contribute to the Conservation District pursuant to Article 11 of the Planning Code. The new building project would require conformance with the General Plan, compliance with Article 11 of the Planning Code, and Planning Code Sections 303 and 309 review and approval by the Planning Commission.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Initial Study for the project, which is attached.

Deadline for Filing an Appeal of this Determination to the San Francisco Planning Commission: January 24, 2001

An appeal requires:

- 1) a letter specifying the grounds for appeal, and;
- 2) a \$209.00 filing fee.


HILLARY E. GITEMAN, Environmental Review Officer

185 POST STREET INITIAL STUDY 00.272E

I. PROJECT DESCRIPTION

The project site (Lot 18 in Assessor's Block 310) is one block east of Union Square in downtown San Francisco, at the southeast corner of Post Street and Grant Avenue (see Figure 1). The 3,600- square-foot project site, situated within the Kearny-Market-Mason-Sutter Conservation District, is occupied by a vacant six-story-plus-basement structure that consists of approximately 15,400 square feet of retail space and 10,800 square feet of office space.

The project would consist of demolition of the existing 26,200-square-foot building and construction of a new ten-story-plus-basement, 130-foot tall building that would serve as the West Coast headquarters and retail store of the apparel company, Prada USA. The new structure would contain approximately 39,300¹⁴ square feet (sq. ft.), with part of the basement serving as storage and mechanical equipment space, display space and a reception area on the ground floor, retail space on the second through fifth levels, open space on the sixth level, showroom space on the seventh level, office space on the eighth and ninth levels, and a private residential space on the top floor (see Figures 2-5 for representative floor plans). In total, the project would provide approximately 4,400 sq. ft. of office space, 6,800 sq. ft. of retail space, 1,500 sq. ft. of showroom space, 1,700 sq. ft. of residential space, 2,250 sq. ft. of open space, and 22,650 sq. ft. of storage and other space.¹⁵ The proposed structure, at a height of 130¹⁶ feet, would be 42 feet taller than the 88-foot tall structure currently on the project site.

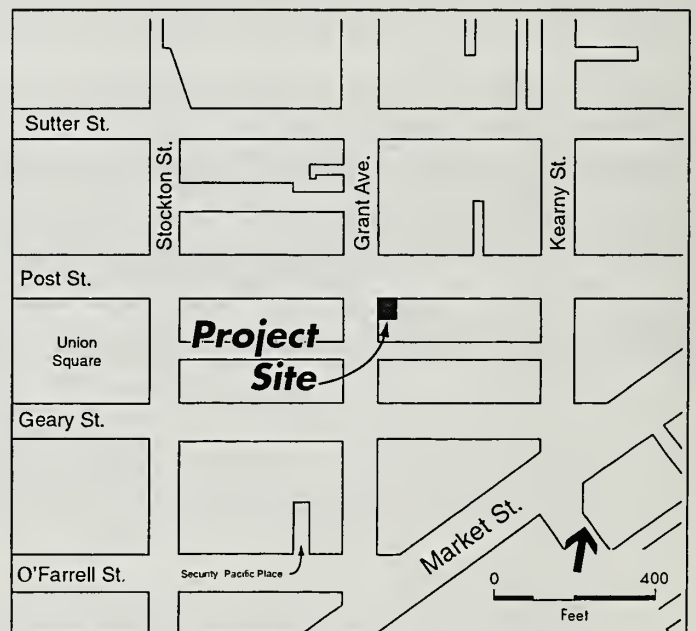
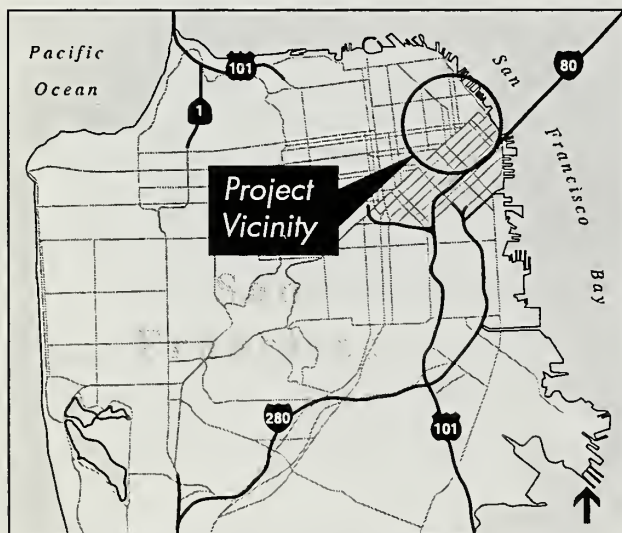
The ground-floor of the ten-story project building would function as a reception area for both the headquarters operations and the retail store, and would include areas for retail display, small public gatherings, and art exhibits. Building patrons would enter the glass-enclosed ground-floor space from either Grant Avenue or Post Street, from where they would access the second-floor retail level via a glass staircase or one of three passenger elevators (one also useable as a freight elevator). An escalator accessible directly from Grant Avenue would also provide access to the second level (see Figure 2). Also located on the ground floor would be two emergency exits from two sets of enclosed stairways.

The second through fifth floor retail spaces, each of which would have a distinctive layout and inter-floor connection, would be open to the public during business hours. The sixth floor open space, which would be enclosed by a decorative metallic screen, would similarly be accessible to the public and would

¹⁴ This number reflects the total square feet of the proposed project, an amount greater than the Gross Floor Area as defined by Planning Code Section 102.9. Gross Floor Area, which in the case of the proposed project would not include the open space on the sixth level or the storage/mechanical space in the basement, is used for calculating a project's FAR.

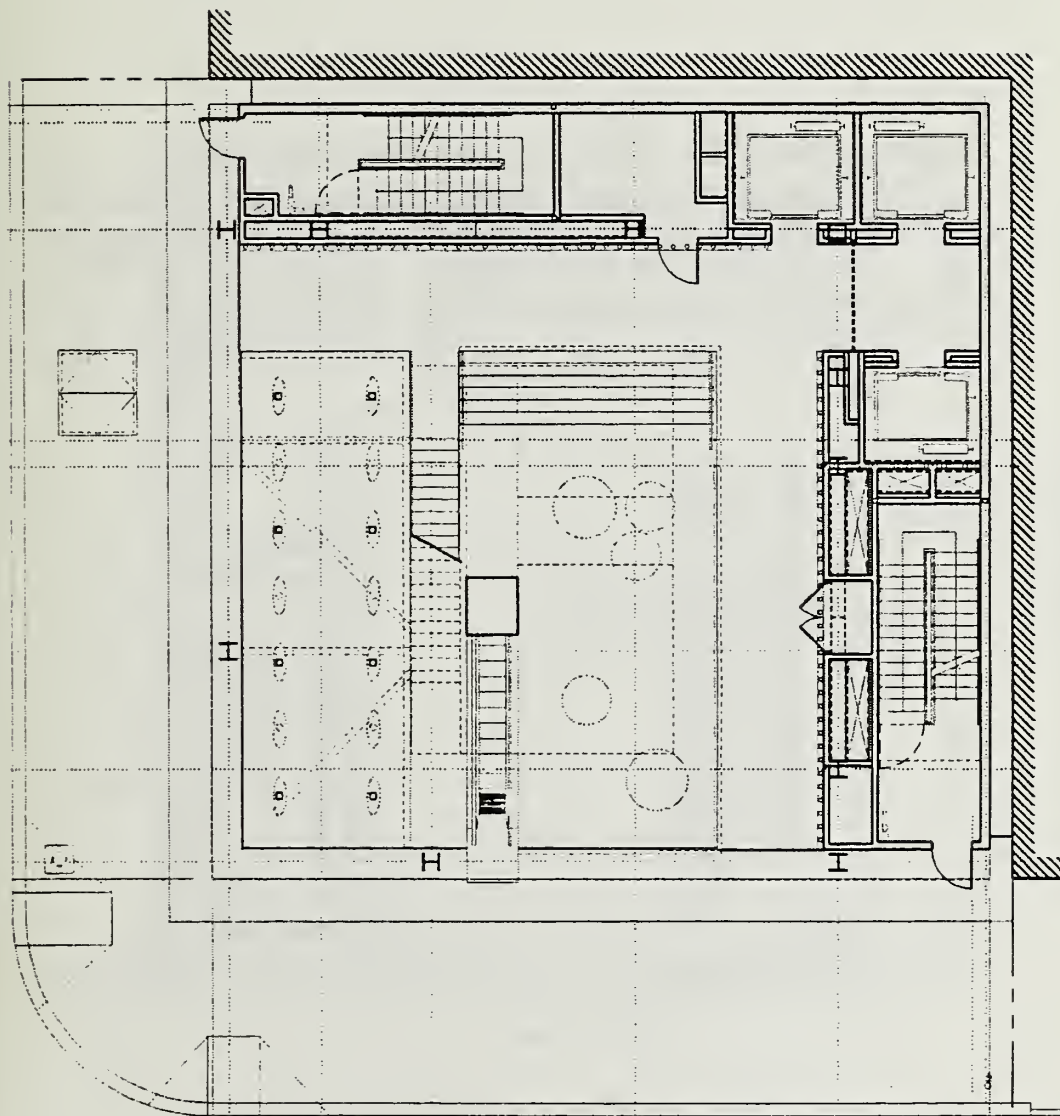
¹⁵ The 22,650 sq. ft. of "storage and other space" includes mechanical equipment, stairwells, elevators, etc.

¹⁶ The roof line of the proposed project would be at 130 feet (with an exception granted for exceeding the base 80-foot height as allowed pursuant to Planning Code Sections 263.8 and 309), while mechanical equipment screened behind a parapet would extend to 139 feet (with the additional 9 feet exempted from the height limit by Planning Code Section 260(b)(1)).



POST STREET

GRANT AVENUE

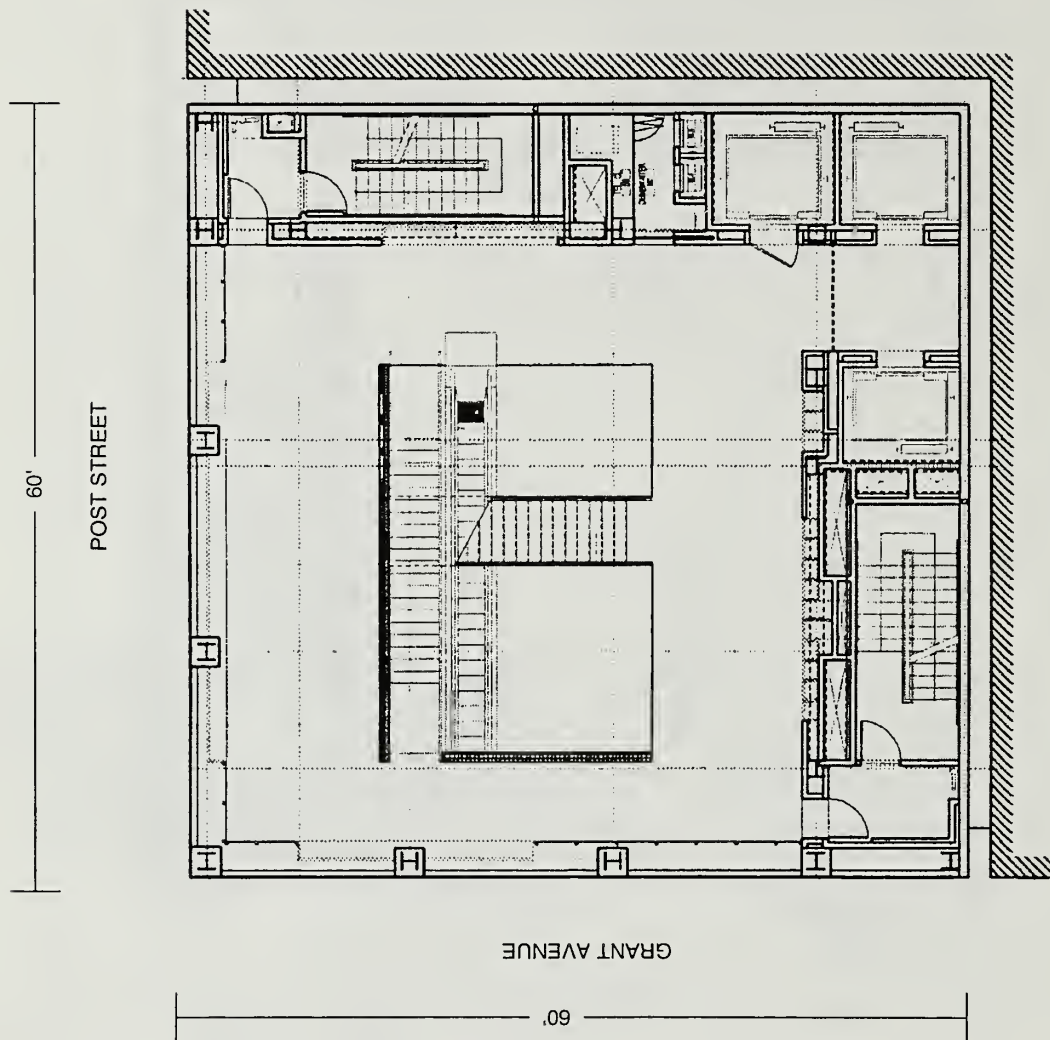


185 Post Street / 200249 ■

Figure 2

Ground Floor Plan

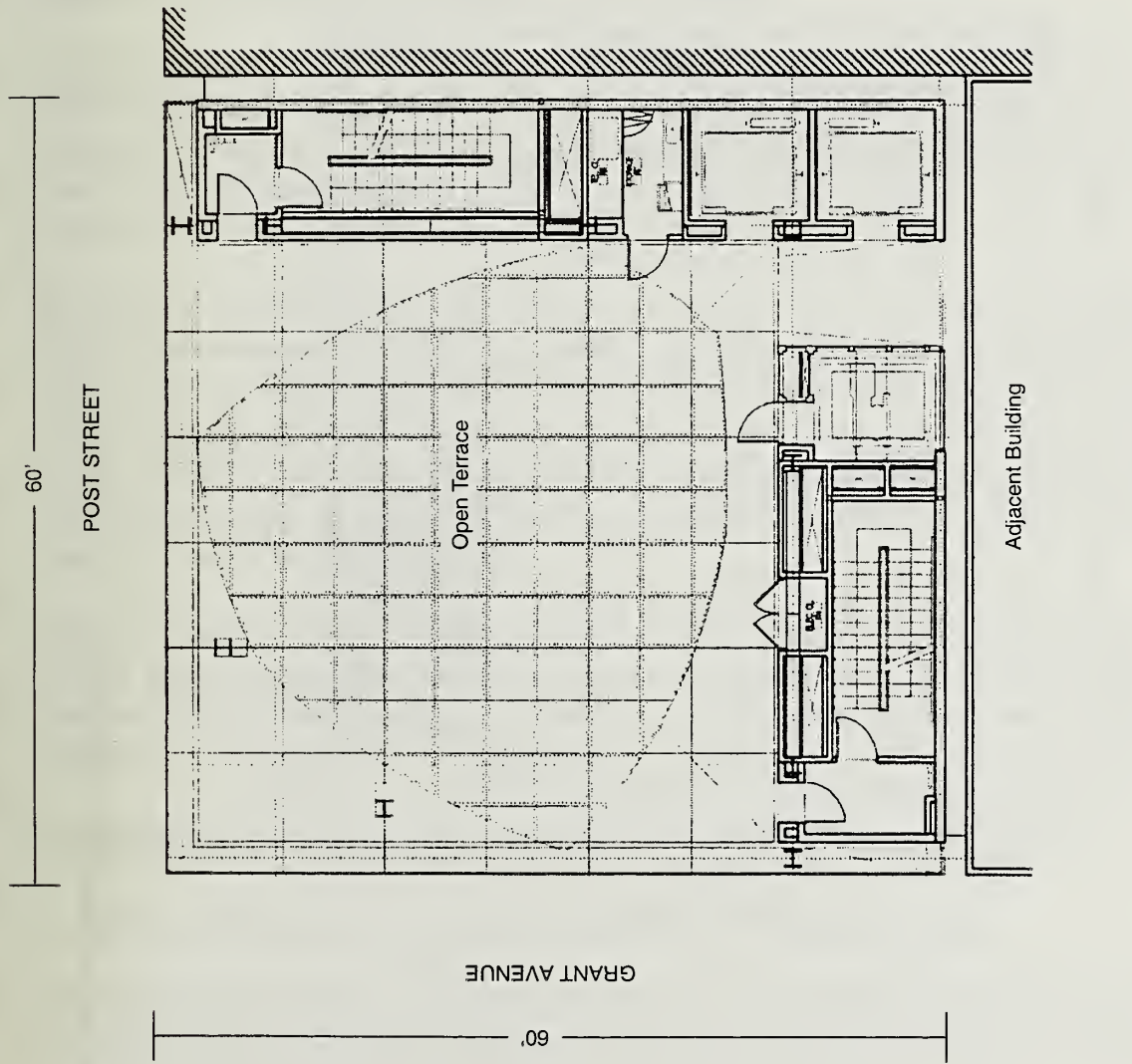
SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.



SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249

Figure 3
Second Floor Plan
(Retail)

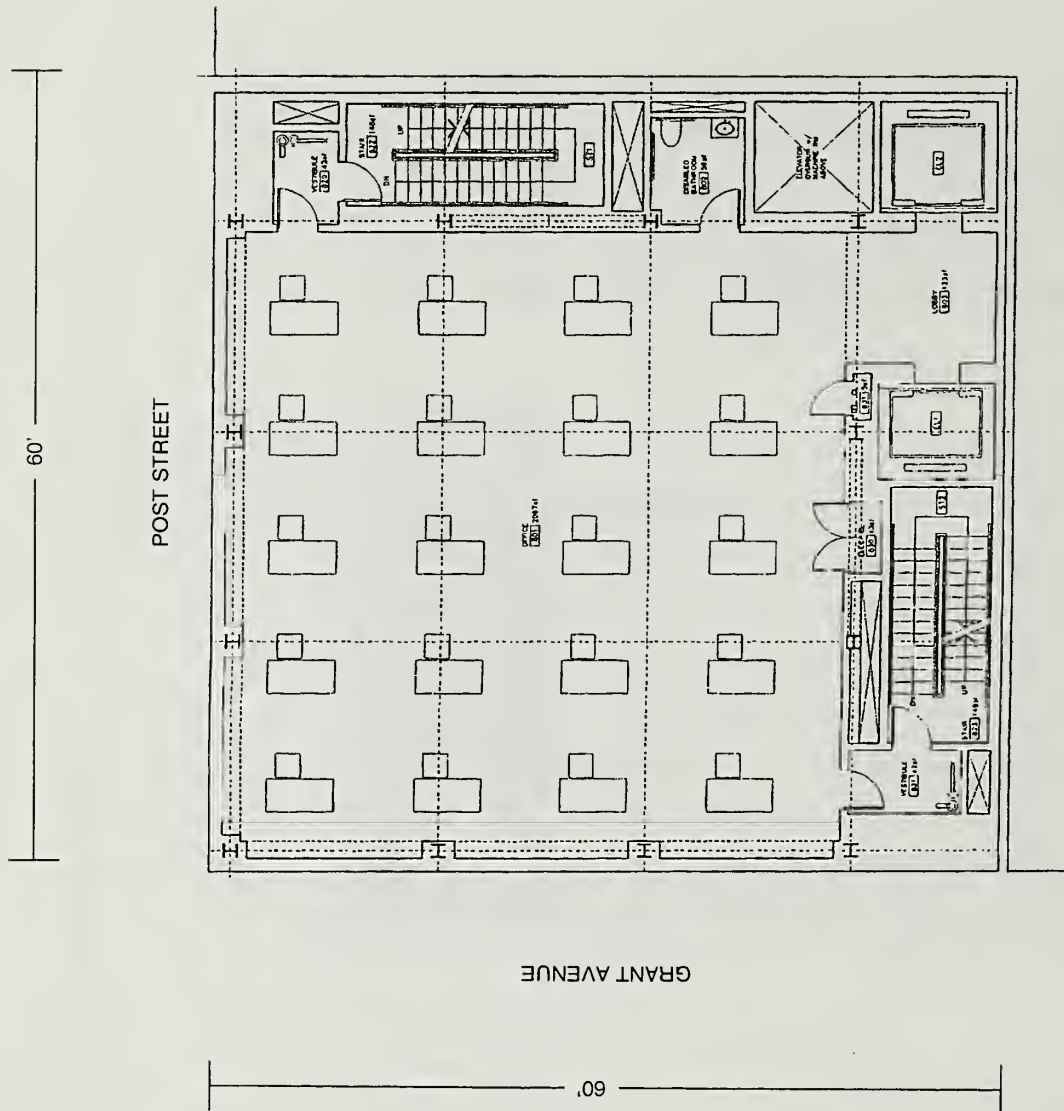


185 Post Street / 200249

Figure 4

Sixth Floor Plan
(Public Open Space)

SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.



SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249

Figure 5
Eighth Floor Plan
(Office)

feature a coffee bar and seating. The showroom, offices, and private residential unit on the uppermost four levels would not be publicly accessible. The residential unit would be for the exclusive use of the project sponsor.

The building's façade, which would extend to the site's property lines, would be composed of stainless steel, stone, and glass. The matte-finished stainless steel structural skin, which would bear a substantial portion of the building's lateral load, would be perforated with circular windows of varying size through which a grid of supporting steel beams and columns would be visible (see Figures 6 and 7 for representative elevations). The perforations would also allow diffused interior lighting and glimpses of interior building uses to be visible from outside the building.

The existing six-story-plus-basement building at 185 Post Street is constructed of steel and concrete. Built in 1908, but completely remodeled through numerous alterations beginning in 1951,¹⁷ it is a Category V (Unrated) Building (Building not Significant or Contributory) within the Kearny-Market-Mason-Sutter Conservation District and was rated "D" (Minor or No Importance) by the Foundation for San Francisco's Architectural Heritage.

The project's floor area ratio (FAR) would be 8.7:1, which exceeds the basic permitted FAR in the C-3-R District (without transfer of development rights to the site) of 6:1, but with the transfer of development rights, would be within the allowable maximum FAR of 9:1. A site from which the development rights would be transferred has yet to be identified. Because the project site is located within the 80-130-F Height and Bulk District, the proposed project would require an exception to exceed 80 feet in height. The existing site does not have parking or a loading dock, and no parking or loading accommodations would be provided as part of the project.

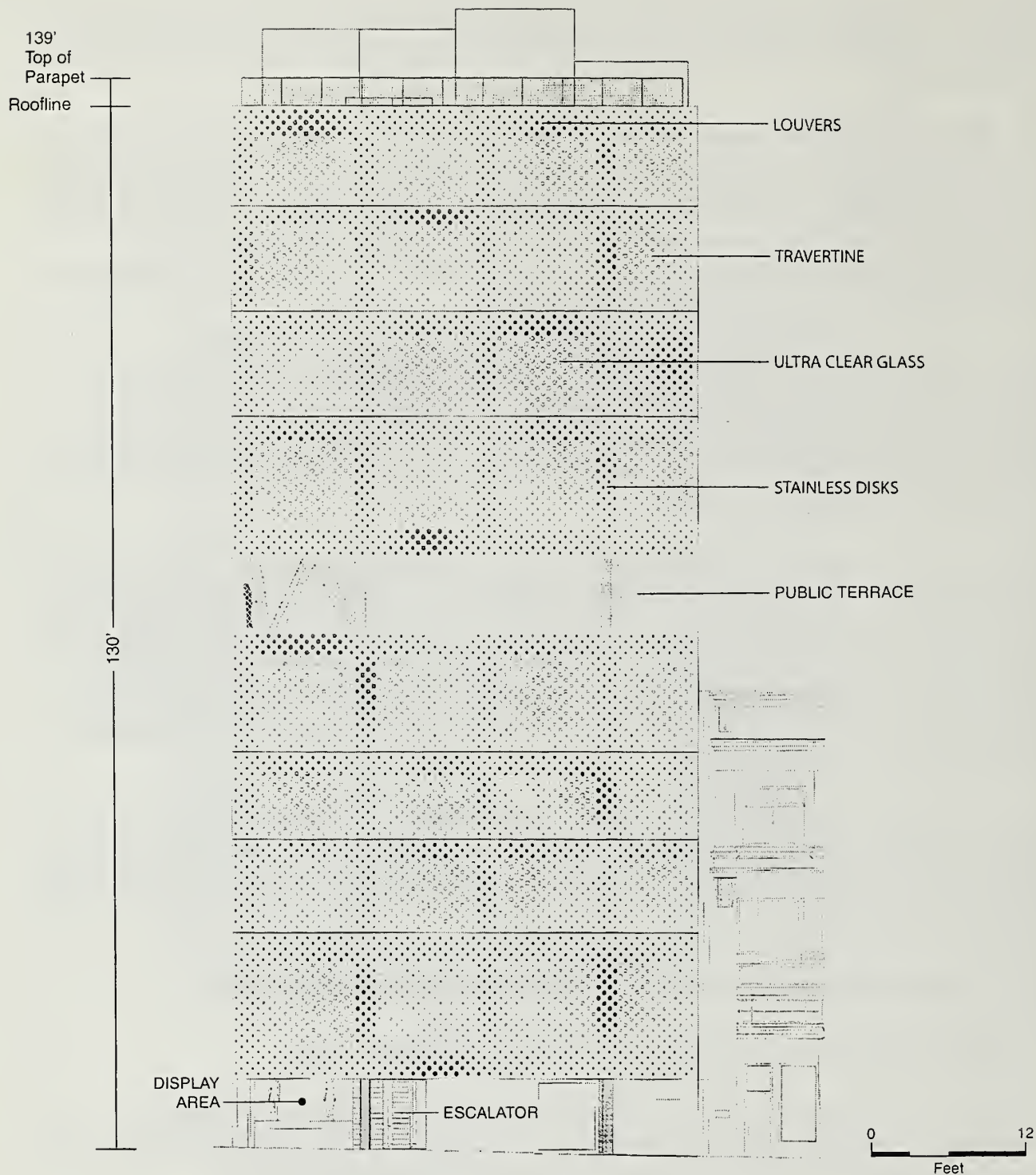
Project construction, including demolition of the existing building, would take approximately 16 to 19 months, with the proposed building opening planned for summer 2002. The project architects are Rem Koolhaas of the Office for Metropolitan Architecture in Rotterdam, The Netherlands, and Brand + Allen Architects of San Francisco.

II. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

The 185 Post Street project is examined in this Initial Study to identify potential effects on the environment. Impacts on historic architectural resources, and visual quality have been determined to be potentially significant, and will be analyzed in an Environmental Impact Report (EIR).

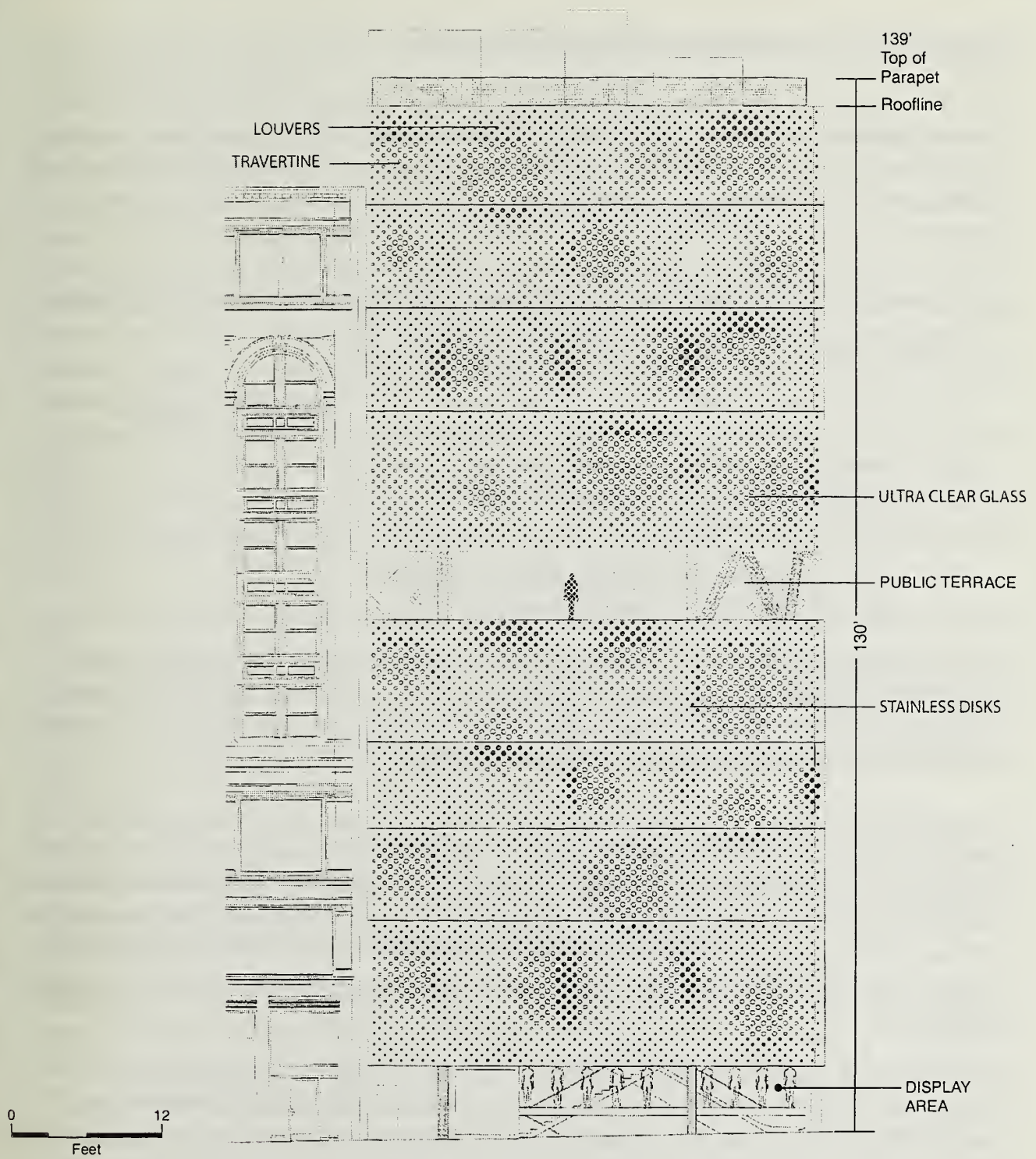
¹⁷ According to building permit records, a total of 19 different permits were issued between 1951 and 1997 for a wide range of building alterations.



SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249 ■

Figure 6
West Elevation
(Grant Avenue)



SOURCE: Office for Metropolitan Architecture, Brand and Allen Architects Inc.

185 Post Street / 200249 ■

Figure 7
North Elevation
(Post Street)

B. EFFECTS FOUND NOT TO BE SIGNIFICANT

The following potential impacts were determined either to be insignificant or to be mitigated through measures included in the project. These items are discussed in Section III below, and require no further environmental analysis in the EIR: land use, population, noise, transportation, air quality, shadow, wind, utilities/public services, biology, geology/topography, water, energy, hazards, and archaeological resources.

III. ENVIRONMENTAL EVALUATION CHECKLIST AND DISCUSSION

A. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<u>Discussed</u>	<u>Not Applicable</u>
1) Discuss any variances, special authorizations, or Changes proposed to the City Planning Code or Zoning Map, if applicable.	<u>X</u>	<u> </u>
2) Discuss any conflicts with any adopted environmental Plans and goals of the City or Region, if applicable.	<u>X</u>	<u> </u>

The San Francisco Planning Code, which incorporates by reference the City Zoning Maps, governs permitted uses, densities and configuration of buildings within San Francisco. Permits to construct new buildings or to alter or demolish existing ones may not be issued unless the proposed project conforms to the Code or an exception is granted pursuant to provisions of the Code.

The project site is within a C-3-R (Downtown Retail) District. The Planning Code states that the C-3-R District “is a regional center for comparison shopper retailing and direct consumer services. It covers a compact area with a distinctive urban character, consists of uses with cumulative customer attraction and compatibility, and is easily traversed by foot” (Section 210.3). Retail sales and residential dwellings are principal permitted uses in the C-3-R District. Professional and business offices above the ground floor require Conditional Use Authorization by the Planning Commission pursuant to Planning Code Sections 219 and 303.

The project site is within the 80-130-F Height and Bulk District (80-foot basic height limit, with exceptions for heights up to 130 feet, provided there is no adverse shadow effect, the taller building provides an appropriate transition to adjacent buildings, and the height above 80 feet is set back from the street to maintain a continuity of street wall height; the “F” bulk limit indicates a maximum plan dimension of 110 feet and maximum diagonal dimension of 140 feet, above 80 feet in height). The 130-foot tall proposed project would exceed the base permitted height, but would comply with the bulk limit. The project would have a floor area ratio (FAR) of 8.7:1, which exceeds the maximum basic FAR permitted in the C-3-R District of 6:1, but would be under the maximum allowable of 9.0:1 with Transfer of Development Rights (TDRs) per Planning Code Section 123(c)(1). Zoning in the project vicinity is

generally C-3-O to the east of Kearny Street and C-3-R to the west of Kearny, except that Union Square is in a P (Public Use) District.

Section 309 of the Planning Code, Permit Review in C-3 Districts, governs the review of project authorization and building and site permit applications in the C-3 Districts. The project would require review and approval at a public hearing by the Planning Commission under Section 309 because the sponsor seeks exceptions, pursuant to Section 309, to the following Code sections: Exception to Height Limits in the 80-130-F Height and Bulk District (Section 263.8), because the project would exceed the base permitted height of 80 feet; Sunlight Access to Public Sidewalks in C-3 Districts (Section 146), because, above 66 feet in height, the proposed project would not be set back such that it would avoid penetration of a sun angle of 50 degrees; and Reduction of Ground-level Wind Currents in C-3 Districts (Section 148), because the project would not eliminate all of the existing pedestrian comfort criteria exceedances. Section 309 also permits the imposition of certain conditions in regard to such matters as a project's siting and design; view, shadow and wind characteristics; parking, traffic and transit effects; energy consumption; pedestrian environment; and other matters. In addition, the project would require a variance because it would not meet the requirement of one parking space for every four residential units as established by Section 151, Required Off-Street Parking Spaces.

Due to the project site's location in the Kearny-Market-Mason-Sutter Conservation District, construction of the proposed building would require authorization under Article 11 of the Planning Code, "Preservation of Buildings and Districts of Architectural, Historical, and Aesthetic Importance in the C-3 Districts." The project would also be subject to Planning Code Section 295 (shadow on certain public open spaces) and, as noted, Section 146 (sunlight on public sidewalks in the C-3 Districts). Shadow effects related to both Code sections are discussed on p. 22.

Environmental plans and policies, like the Bay Area '97 *Clean Air Plan*, directly address physical environmental issues and/or contain standards or targets that must be met in order to preserve or improve specific components of the City's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy.

The City and County of San Francisco *General Plan* provides general policies and objectives to guide land use decisions. The proposed project is within that part of San Francisco covered by the Downtown Plan, an area plan contained within the *General Plan*. In general, potential conflicts with the *General Plan* are considered by the decisions-makers (normally the Planning Commission) independently of the environmental review process, as part of the decision to approve, modify or disapprove a proposed project. Any potential conflict not identified here could be considered in that context, and would not alter the physical environmental effects of the proposed project. The relationship of the proposed project to objectives and policies of the *General Plan* will be discussed in the EIR.

On November 4, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative, which established eight Priority Policies. These policies are: preservation and enhancement

of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under the *California Environmental Quality Act* (CEQA), or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The motion for the Planning Commission under Planning Code Section 309 will contain the analysis determining whether the project is in conformance with the Priority Policies.

B. ENVIRONMENTAL EFFECTS

Except for the items regarding historic architectural resources and visual quality, all other items on the Initial Study Checklist have been checked “No,” indicating that, upon evaluation, staff has determined that the proposed project could not have a significant adverse effect in those areas. Several checklist items have also been checked “Discussed,” indicating that the text includes discussion of that particular issue. For all of the items checked “No” without discussion, the conclusions regarding potential adverse environmental effects are based on field observation, staff and consultant experience on similar projects, and/or standard reference material available within the Planning Department such as the Department’s Transportation Guidelines for Environmental Review, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Game. For each Checklist item, the evaluation has considered the impacts of the project both individually and cumulatively.

1) <u>Land Use</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Disrupt or divide the physical arrangement of an established community?	_____	<u>X</u>	<u>X</u>
(b) Have any substantial impact upon the existing character of the vicinity?	_____	<u>X</u>	<u>X</u>

The 3,600 square-foot project site is currently occupied by 185 Post Street (also known as 199 Post Street), an 88-foot tall, six-story rectangular building that has been vacant since 1997 and previously served commercial and retail uses. The building provides approximately 26,200 square feet (sq. ft.) of space.

Land uses in the project vicinity are predominantly retail, with upper-story office uses in many buildings. Adjacent to the project site to the south is a three-story retail clothing store, while adjacent to the east is a eight-story building with ground-floor retail space and offices above. Across Post Street and Grant Avenue are buildings that primarily have ground-floor retail and office uses on upper floors. Building heights are typically three to five stories, but also range from three to twelve stories tall.

The proposed project, a new ten-story retail, office, and top story residential building of approximately 39,300 sq. ft., would result in an increase in intensity of existing land uses on the project site, given that the existing building is about two-thirds the proposed size and has been vacant for at least three years. However, the project would not alter the general land use or character of the immediate area, which includes many mixed-use retail and office buildings.

The project would not disrupt or divide the neighborhood since it would be achieved within the existing block configuration, and retail and office uses predominate the vicinity. Residential units are not common in the immediate vicinity, which does include numerous tourist hotels, however the proposed single residential unit would not be an intensive enough use to conflict with existing uses in the vicinity. Land use effects of the proposed project would be less-than-significant and, as such, this topic does not need to be further analyzed in the EIR. However, land use issues will be discussed in the EIR for informational purposes. Neighborhood character, as it relates to historic preservation, will be discussed in the EIR analysis of historic architectural resources.

2) <u>Visual Quality</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Have a substantial, demonstrable negative aesthetic effect?			<u>To be Determined</u>
(b) Substantially degrade or obstruct any scenic view or vista now observed from public areas?	<u> </u>	<u> X </u>	<u> X </u>
(c) Generate obtrusive light or glare substantially impacting other properties?			<u>To be Determined</u>

The proposed project would result in a visual change to the project site since it would consist of the demolition of an existing six-story building with a 1950s facade treatment and new construction of a modern ten-story building in its place. The proposed structure would differ visually from the existing structure in a number of ways, including height, streetwall, and architectural style. Project effects on the visual quality of the Kearny-Market-Mission-Sutter Conservation District and the project area will be analyzed in the EIR.

Visual changes on the site would not substantially change or block any scenic vista currently enjoyed from public open spaces in the area. The proposed project would be constructed within a densely built urban area. From long-range vantage points, such as Potrero Hill and Twin Peaks, the proposed project would be indistinguishable from the context of surrounding and other nearby buildings. Although the increased building height on the project site would be visible from surrounding buildings, the proposed project would not obstruct any publicly accessible scenic views or have a substantial adverse effect on a scenic vista from Union Square, a public park located one block west of the project site. The proposed project would therefore have less-than-significant effects on scenic views and vistas. Because a determination has yet to be made of the project design's compatibility with the guidelines established for the Kearny-Market-Mason-Sutter Conservation District (set forth in Appendix E of Article 11 of the

Planning Code), this topic will be discussed further in the EIR. It should be noted that in response to the Planning Department's evaluation of the project for its compatibility with the Conservation District's guidelines, the building design may undergo further refinement.

3) <u>Population</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Induce substantial growth or concentration of population?	_____	<u>X</u>	<u>X</u>
(b) Displace a large number of people (involving either housing or employment)?	_____	<u>X</u>	<u>X</u>
(c) Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?	_____	<u>X</u>	<u>X</u>

The project sponsor estimates that the proposed project would employ a maximum of 300 people, with no more than 200 working at any one time on the site. This increase in population at the project site, while potentially noticeable to adjacent neighbors of the proposed project, would not substantially contribute to the existing populated area. The existing building on the project site is vacant and therefore no one currently works on the site. As there is no residential use on the site, there would be no residential displacement. The anticipated net increase in employment on the site would be minimal when considered in the context of greater Downtown San Francisco, and would not be expected to have a measurable effect on demand for housing in San Francisco or the Bay Area. Further, it is likely that not all employees would represent new residents to San Francisco or the Bay Area. Some new employees may seek new housing within the City. Others would already live in the City and therefore would not likely add to the demand for housing in San Francisco. Although housing affordability and availability remains an important policy issue in San Francisco and throughout the Bay Area, project employment, even if it were to represent all new residents, would result in an extremely small contribution to overall housing demand, and would not be considered significant. The project would not be expected to induce any substantial amount of new growth, either residential or commercial. Population and housing require no further analysis in the EIR.

4) <u>Transportation / Circulation</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	_____	<u>X</u>	<u>X</u>
(b) Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	_____	<u>X</u>	<u>X</u>
(c) Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?	_____	<u>X</u>	<u>X</u>
(d) Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	_____	<u>X</u>	<u>X</u>

Traffic

Within the project vicinity, Sutter Street, Post Street, Geary Street, O'Farrell Street, Powell Street, Stockton Street, Kearny Street and Market Street are designated in the Transportation Element of the San Francisco General Plan as Transit Preferential Streets. On these streets, priority is given to transit vehicles over autos during commute and business hours on weekdays usually along the right curbside lanes. O'Farrell, Geary, Kearny, Bush and Pine Streets are designated in the Transportation Element as Major Arterials, which the General Plan defines as "cross-town thoroughfares whose primary function is to link districts within the City and to distribute traffic from and to the freeways." Grant Avenue and Market Street are designated as pedestrian-oriented vehicular streets on the Citywide Pedestrian Network in the Transportation Element, which provide inter-neighborhood connections. Sutter and Post Streets (Route 16), Stockton Street (Route 17, north of Post Street), and Market Street (Route 50) are designated as Citywide Bicycle Routes in the Transportation Element; these bicycle routes are Class III routes, meaning bicyclists and motorists share the roadway. All intersections in the vicinity of the project site are controlled by traffic signal. Streets serving the project vicinity have two travel lanes, with many having a third lane for buses and right turns only. The east-west streets generally form one-way couplets, as do many of the north-south streets.

On weekdays, the project would generate about 3,554 net new person trips per day, with a total of about 155 net new person trips (4% of daily person trips)¹⁸ during the p.m. peak hour, and about 28 p.m. peak-hour vehicle trips.^{19,20} This amount of trips would not result in effects on nearby roadways or intersections that would be noticeable with daily fluctuations in traffic. Hence, traffic impacts associated with the project would not be significant relative to the existing capacity of the surrounding street

¹⁸ The percentage of daily person trips that the p.m. peak hour person trips represents is based on a proportional application of trip generation rates for each of the different project uses (retail, office, and "other").

¹⁹ To be conservative, for the purposes of calculating trip generation, the proposed seventh-floor showroom space was treated as retail space and the tenth-floor residential space as office.

²⁰ The 28 vehicle trips represent 45 person-trips by vehicle; the number of vehicle trips is less than the number of person trips by vehicle because of some vehicles carrying more than one person.

system. As such, the proposed project would also not interfere with existing transportation systems, nor cause substantial alterations to circulation patterns or major traffic hazards.

Transit

Due to the location of the project site in a dense retail district and in a highly transit-accessible area of the City, approximately two-thirds of employees and visitors to the proposed project would likely use public transit or walk to the project site. There are 25 local MUNI lines that serve the area. Among these lines are the 3-Jackson, 4-Sutter, 38-Geary, 30-Stockton, and 45-Union-Stockton. In addition, the Powell-Mason and Powell-Hyde cable car lines are two blocks from the project site and the Powell Street and Montgomery Street MUNI Metro and BART stations are both within three blocks of the project site. Other transit services, including AC Transit, SamTrans, Golden Gate Transit, and Caltrain, are available via connecting MUNI lines.

The 38 net new p.m. peak-hour transit (chiefly MUNI) trips (representing approximately 5% of daily transit trips), dispersed over the 25 MUNI routes that serve the project area, would not measurably affect existing service. The project would, however, contribute to cumulative increases in transit ridership that would result in an incremental increase in capacity utilization. This impact would not be considered significant, because the increase would not be substantial in the context of daily fluctuations in ridership.

Parking

The proposed project is in the C-3-R (Downtown Retail) District, in which off-street parking is not required for commercial uses. In C-3 Districts, one parking space is required for each four dwelling units (per Planning Code Section 151). The project site currently provides no off-street parking spaces and the proposed project would not include any on-site parking. The project sponsor may try to secure an off-street parking space within 600 feet of the project site, as provided for in Section 159 of the Planning Code. However, if no such space is secured, with regards to the Planning Code, the proposed project would result in a shortfall of one parking space and the project would require a variance from Section 151, Required Off-Street Parking Spaces.

The project would create long-term parking demand for about 45 net new parking spaces, and short-term parking demand for about 47 net new spaces, for a total parking demand of about 92 spaces. As stated above, the project does not propose to provide any off-street parking spaces, resulting in an unmet demand of about 92 spaces that would have to be accommodated in off-street parking facilities. (Existing on-street parking conditions are essentially fully occupied, based on field observations.) The average weekday mid-afternoon occupancy in off-street parking garages within the project area would be expected to increase slightly from the existing 92 percent²¹ to approximately 94 percent as a result of the

²¹ Based on a survey of existing parking capacity and occupancy in the area bounded by Bush, Keamy, Market and Powell Streets (there are approximately 5,000 parking spaces within the study area) as reported in the *Neiman Marcus Expansion Project Transportation Study*, April 2, 1999, Environmental Science Associates. This report is available for public review in Project File No. 98.813E at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

unmet parking demand generated by the project. As such, the project would not substantially alter the existing parking conditions in the area such that demand could be accommodated by existing parking facilities.

Loading

The project site currently has no loading space and no space is required per Section 152.1 of the Planning Code.²² The project would generate a total of about six service vehicle stops per day. Average and peak hourly demand for the proposed building would both be substantially less than one space per hour. An existing cargo elevator located in the sidewalk in front of the project site on Post Street would be retained and used for loading. Because no loading space would be provided, it is likely that trucks serving the project site would park in a designated loading area in front of the project site on Post Street and use either the sidewalk cargo elevator or an elevator on the ground floor to load deliveries. Because the project would result in less-than-significant effects on traffic, transit, loading and parking, these topics will not be discussed further in the EIR.

5) <u>Noise</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Increase substantially the ambient noise levels for adjoining areas?	_____	<u>X</u>	<u>X</u>
(b) Violate Title 24 Noise Insulation Standards, if applicable?	_____	<u>X</u>	<u>X</u>
(c) Be substantially impacted by existing noise levels?	_____	<u>X</u>	_____

Traffic Noise

Generally, traffic must double in volume to produce a noticeable increase in noise levels. Traffic volumes in the vicinity of the project site would not be expected to double as a result of the project; therefore, substantial increases in traffic noise in the project area would not be anticipated. Freight loading activities would increase markedly, because the project would represent an introduction of new uses to a site where there is currently no activity. However, given the project's location in a dense urban area where regular loading activity is common, noise associated with loading activities would not be substantial. Traffic noise would not be significant and requires no further discussion in the EIR.

Building Equipment Noise

The project would include mechanical equipment, such as air conditioning units and chillers, that could produce operational noise. These operations would be subject to the San Francisco Noise Ordinance, Article 29 of the San Francisco Police Code. Compliance with Article 29, Section 2909, would minimize

²² Because the project would provide less than 10,000 sq. ft. of retail space, less than 5,000 sq. ft. of office space (per Section 153(a)(5)), and less than 100,000 sq. ft. of residential space, no loading spaces are required.

noise from building operations, which would not be significant. Therefore, building equipment noise will not be analyzed further in the EIR.

Construction Noise

Demolition, excavation, and building construction would temporarily increase noise in the site vicinity. The construction period, including demolition of the existing building, would last approximately 16 to 19 months. Construction noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. The project would not require pile driving; therefore, groundborne vibration and noise would be limited.

During the construction period, temporary construction noise would be noticed by neighboring retail and office workers. (There are no nearby residences or other “sensitive receptors,” such as schools or hospitals.) Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the City Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools (such as jackhammers and impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by five dBA at the project property line, unless a special permit is authorized by the Director of Public Works.

At times during construction, noise levels would disturb surrounding building occupants and could interfere with indoor activities in nearby stores and offices. Noise impacts would be temporary and intermittent in nature and limited to the period of construction. Further, project construction would comply with the San Francisco Noise Ordinance. Therefore, construction noise is not considered a significant environmental impact.

In light of the above, construction noise would not be significant and will not be analyzed further in the EIR.

6) <u>Air Quality/Climate</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	_____	<u>X</u>	<u>X</u>
(b) Expose sensitive receptors to substantial pollutant concentrations?	_____	<u>X</u>	_____
(c) Permeate its vicinity with objectionable odors?	_____	<u>X</u>	_____
(d) Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?	_____	<u>X</u>	<u>X</u>

Air Quality

The Bay Area Air Quality Management District (BAAQMD) has established thresholds for projects requiring its review for potential air quality impacts. These thresholds reflect the minimum size of projects that the BAAQMD considers capable of producing air quality problems due to vehicular emissions. Generally, for retail and commercial projects, the threshold is between 4,100 and 4,500 daily vehicle trips, and the BAAQMD generally does not require a detailed air quality analysis for projects generating fewer than 2,000 vehicle trips per day. As stated in Section III.B.4, Transportation, the project would generate about 490 daily vehicle trips. Therefore, the project would not result in any significant air quality impacts due to vehicular emissions.

Construction Emissions

Because the project would involve limited earthmoving activities, effects of ground-disturbing construction on local air quality would be limited. To the extent that the project would generate dust from earthmoving or demolition, it could cause a temporary increase in particulate dust and other pollutants. Heavy equipment could create dust and emit nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), hydrocarbons (HC), and particulate matter with a diameter of 10 microns or less (PM₁₀) as a result of diesel fuel combustion.

Dust emission during demolition and excavation would increase particulate concentrations near the site. Dust can be expected at times to fall on surfaces located within 200 to 800 feet of the project site. Under winds exceeding 12 miles per hour, localized effects including human discomfort might occur downwind from blowing dust. Construction dust is composed primarily of larger particles that settle out of the atmosphere more rapidly with increasing distance from the source and are easily filtered by human breathing passages. In general, construction dust would result in more of a nuisance than a health hazard in the vicinity of construction activities. About one-third of the dust generated by construction activities consists of smaller size particles in the range that can be inhaled by humans (*i.e.*, particles 10 microns or smaller in diameter), known as PM₁₀, although those particles are generally inert. Persons with

respiratory diseases immediately downwind of the site, as well as any unprotected electronics equipment, could be sensitive to this dust.

The Bay Area Quality Management District (BAAQMD), in its CEQA Guidelines, has identified a set of feasible PM₁₀ control measures for construction activities that would be included as project conditions. The project sponsor would require the contractor to dampen the construction site twice a day during construction to reduce particulates by at least 50 percent; would require covering soil, sand and other material; and would require street sweeping around the site during demolition and construction at least once per day (see Mitigation Measure No. 1, p. 53). With implementation of this measure, construction-related air quality effects would be reduced to a less-than-significant level.

Shadow

Section 295 of the Planning Code was adopted in response to Proposition K (passed in November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. Section 295 restricts new shadow upon public spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the Planning Commission finds the impact to be insignificant. As determined by a shadow fan analysis conducted by the Planning Department, the project would not cast new shadow on Union Square. There are no other publicly accessible open spaces that would be affected by shadow from the proposed project.

The project site is also located in an area subject to Section 146 of the Planning Code, which protects sunlight access within the C-3 (Downtown Commercial) Districts. Specifically, Section 146 sets forth provisions to maintain direct sunlight on certain public sidewalks during critical periods of use through prescribed sun access planes defined by an angle sloping away from the street above a stipulated height at the property line abutting the street. These provisions apply to new structures and additions to existing structures on parcels on regulated streets. The project site is located within two street segments subject to Section 146: the south side of Post Street from Mason Street to 200 feet east of Kearny Street, and the east side of Grant Avenue from Market to Bush Streets. The Grant Avenue segment has a required sun access angle for a street wall above 170 feet, hence the proposed project's height, which would be 130 feet tall on Grant Avenue, would comply with this requirement. However, the Post Street segment has a required sun access angle of 50 degrees for a street wall above 66 feet, and therefore is applicable to the proposed project.

The proposed project would add limited new shadow to adjacent streets and sidewalks. However, because the project sponsor will seek an exception from the sun access angle requirement of Section 146 to allow for a less-than-required setback above 66 feet on the Post Street side of the project, an additional shadow analysis was conducted.²³ Shadow was evaluated at 9:00 a.m., 10:00 a.m., 2:00 p.m., and

²³ This analysis is summarized from a Technical Memorandum prepared by Environmental Science Associates, July 24, 2000, that is available for public review at the San Francisco Planning Department, 1660 Mission Street, Suite 500, in Case File No. 00.272E.

3:00 p.m. on the two solstices (December 21²⁴ and June 21) and the two equinoxes (March 21 and September 21). The analysis showed that sidewalks on both sides of Post Street in the project area are predominantly in shade much of the year. The south sidewalk remains in shade throughout the year and only in the summer is the north sidewalk in sun all day. The project would cause little change in these conditions. At the equinoxes, March and September, the north sidewalk is mostly in shade until afternoon. The project would result in an increase of up to 8% new shadow on the northern sidewalks that would result in little overall difference in perceived quality or in decreases in physical comfort for pedestrians. Further, none of the north sidewalk areas that would be affected by the project accommodate temporary or permanent seating. Therefore, the project would not result in any significant shadow-related effects.

Wind

Wind impacts are generally caused by large building masses extending substantially above their surroundings, and by buildings oriented such that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. The 130-foot tall project building would add a new structure to the project site that would be 42 feet taller than the existing structure. The project would also result in a change in that the streetwalls of the project building would have gaps at the ground and sixth floor levels rather than being continuous, as are the building walls of the existing building.

To analyze the potential effects on wind conditions in the project vicinity as a result of the proposed project, a wind tunnel analysis was conducted. The findings of the wind tunnel analysis were presented in a Technical Memorandum, a summary of which is provided below.²⁵

Pedestrian-level wind speeds were measured at 27 selected points under existing conditions and conditions with the proposed project in the existing setting to quantify resulting pedestrian-level winds in public spaces near the project site. In accordance with the protocol for wind-tunnel testing in Section 148 of the Planning Code, both scenarios were tested for the northwest, west-northwest, and west wind directions.

The existing wind conditions are generally moderate, with average wind speeds for all 27 test points being just over 9 mph equivalent wind speed. Wind speeds in pedestrian areas range from 5 mph to 23 mph. Winds along Post Street west of Kearny Street range from 7 mph to 11 mph. Winds on the east side of Grant Avenue range from 5 mph to 10 mph and range from 7 mph to 11 mph on the west side of Grant. Winds along Maiden Lane west of Kearny range from 5 mph to 9 mph. All but 5 locations meet the Planning Code's pedestrian-comfort criterion value of 11-mph under existing conditions. Wind speeds of 14 mph or more occur at 4 locations, all on Kearny Street. The highest wind speeds in the

²⁴ The latest time evaluated on December 21 was 3:54 p.m. PST, which is the last Section 295 minute (the last minute before the last hour prior to sunset).

²⁵ This analysis is summarized from a Technical Memorandum prepared by Environmental Science Associates, August 15, 2000, that is available for public review at the San Francisco Planning Department, 1660 Mission Street, Suite 500, in Project File No. 00.272E.

vicinity occur east of the project site, at the northeast corner of the intersection of Post and Kearny Streets. The Code's wind hazard criterion (26 mph) is currently exceeded at that location for a total of 151 hours per year.

Under project conditions, the average wind speed for all 27 test points would decrease slightly, remaining just over 9 mph. Wind speeds in pedestrian areas would range from 4 mph to 23 mph. All but four of the 27 test locations would meet the Planning Code's pedestrian-comfort criterion of 11 mph, and those four are existing exceedances that would continue. The project would add no new exceedance and would eliminate an existing exceedance at the southwest corner of Kearny and Post Streets.

Overall, wind speeds would increase at two locations, remain unchanged at 18 locations, and decrease at seven locations. The highest wind speeds in the vicinity would continue to occur east of the project site, at the northeast corner of the intersection of Post and Kearny Streets. However, with the project, the Planning Code's wind hazard criterion would be exceeded at that point for 97 hours per year, a decrease of nearly 54 hours per year compared to existing conditions. While the proposed project would reduce the number of pedestrian comfort criterion exceedances and the number of hours an existing wind hazard would occur, the project would not eliminate all existing comfort criterion exceedances. As such, the project would require an exception (as provided for in Planning Code Section 309) from the requirement of Planning Code Section 148 that a proposed building reduce pre-existing wind speed exceedances to meet the pedestrian comfort criterion requirements.

Because the project would not generate significant impacts related to air quality, shadow, or wind, as discussed above, these issues will not be discussed further in the EIR.

7) <u>Utilities/Public Services</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Breach published national, state or local standards relating to solid waste or litter control?	_____	<u>X</u>	_____
(b) Extend a sewer trunk line with capacity to serve new development?	_____	<u>X</u>	_____
(c) Substantially increase demand for schools, recreation or other public facilities?	_____	<u>X</u>	_____
(d) Require major expansion of power, water, or communications facilities?	_____	<u>X</u>	<u>X</u>

The proposed project would incrementally increase demand for and use of public services and utilities on the site and increase water consumption, but not in excess of amounts expected and provided for in the project area, and would not be expected to have any measurable impact on public services or utilities. The project would be undertaken in a fully built-out area of downtown San Francisco, where all utilities and services are currently provided for; no need for any expansion of public utilities or public service facilities is anticipated. This topic requires no further analysis and will not be included in the EIR.

8) <u>Biology</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Substantially affect a rare or endangered species of animal or plant or the habitat of the species?	_____	<u>X</u>	<u>X</u>
(b) Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	_____	<u>X</u>	_____
(c) Require removal of substantial numbers of mature, scenic trees?	_____	<u>X</u>	<u>X</u>

The project site is covered entirely by the existing building, and no tree exists on the site. The project site is in a densely developed, intensive urban area where the project would not affect any threatened, rare or endangered animal or plant life or habitat. The project would not interfere with any resident or migratory species. Therefore, the project would not have any effect on any rare or endangered animal or plant species or habitat, and this topic will not be discussed in the EIR.

9) <u>Geology/Topography</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction)?	_____	<u>X</u>	<u>X</u>
(b) Change substantially the topography or any unique geologic or physical features of the site?	_____	<u>X</u>	_____

The *San Francisco General Plan* Community Safety Element contains maps that show areas in the City subject to geologic hazards. The project site is located in an area subject to groundshaking from earthquakes along the San Andreas and Northern Hayward Faults and other faults in the San Francisco Bay Area (Maps 2 and 3). The project site is not within an area of liquefaction potential (Map 4), a Seismic Hazards Study Zone (SHSZ) designated by the California Division of Mines and Geology, April 1997, nor is it within an area susceptible to landslide (Map 5) or tsunami inundation (Map 6). To ensure compliance with all San Francisco Building Code provisions regarding structural safety, when the Department of Building Inspection (DBI) reviews the building plans for a proposed project, it will determine necessary engineering and design features for the project to reduce potential damage to structures from groundshaking. Therefore, potential damage to structures from geologic hazards on a project site would be ameliorated through the DBI requirement for a geotechnical report and review of the building permit application.

The project site is not in an Alquist-Priolo Special Studies Zone, and no known active fault exists on or in the immediate vicinity of the site. The closest active faults are the San Andreas Fault, 7 miles to the west, and the Hayward Fault, 12 miles to the east. Like the entire San Francisco Bay Area, the project site is subject to groundshaking in the event of an earthquake on these faults, although surface rupture is unlikely.

A preliminary geotechnical investigation was conducted for the project site in 2000, which is summarized here.²⁶ A test boring conducted at the site revealed about 4 feet of sand fill with brick fragments below the existing basement floor slab and medium dense dune sand for another approximately 10 to 16 feet. The existing basement floor is about 12 feet below the sidewalk. Below the dune sand are very stiff sandy clay and dense clayey sand. Groundwater was encountered 6 to 8 feet below the basement slab at elevations of 24.5 to 26.5 feet.²⁷

The proposed project would include one level below grade, and construction would require excavation of approximately 870 cubic yards of soil for a sub-basement and underpinning of adjacent buildings. Located in the sub-basement, which would occupy about one-quarter of the footprint of the site, would be a transformer, water storage tank, and an elevator machine room. Soil removed for the underpinning of adjacent buildings would be exclusively within the footprint of the project site and would not extend underneath adjacent buildings. Most of the soil excavation would be to accommodate the proposed foundation system that would replace the existing six-inch thick slab foundation. The proposed foundation would be a base-isolated system of 3'-6" concrete columns on a six-foot thick mat-slab foundation with the isolators located at street level. The project would be constructed with a gap separating it from adjacent buildings to allow for movement from the base isolation system during a seismic event. It is expected that the basement of the proposed project would be at the same level (32.5 feet Elevation) as the basement of the existing building on the project site.

The project sponsor has agreed to follow the recommendations of the geotechnical report(s) (see Mitigation Measure No. 2, p. 32). Because of the depth to groundwater, the project may require temporary dewatering (see Section III.10, Water, below). The project would not alter the topography of the site, and would not result in soil erosion, as the site is, and will remain, entirely covered by impervious surfaces.

No further analyses of geology and seismicity is required in the EIR.

²⁶ Treadwell and Rollo, *Geotechnical Investigation, 185 Post Street, San Francisco, California*, 2 June 2000. This report is on file at the San Francisco Planning Department, 1660 Mission Street, San Francisco, Project File No. 00.272E.

²⁷ San Francisco City Datum.

10) <u>Water</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Substantially degrade water quality, or contaminate a public water supply?	_____	<u>X</u>	_____
(b) Substantially degrade or deplete ground-water resources, or interfere substantially with groundwater recharge?	_____	<u>X</u>	<u>X</u>
(c) Cause substantial flooding, erosion or Siltation?	_____	<u>X</u>	_____

The project site is entirely covered by impervious surfaces. The project would not increase the area of impervious surface on the site, and would not alter the drainage pattern of the site; site runoff would continue to drain into the City's combined sanitary and storm sewer system, as at present. Therefore, neither groundwater resources nor runoff and drainage would be affected.

The 2000 preliminary geotechnical report²⁸ indicated that groundwater was encountered 6 to 8 feet below the existing basement slab at elevations of 24.5 to 26.5 feet (about 18 to 20 feet below the sidewalk). As the project would include excavation, it is possible that temporary dewatering would be required. Any groundwater encountered during construction would be subject to the requirements of the City's Industrial Waste Ordinance (Ordinance No. 199-77), requiring that groundwater meet specified standards before it may be discharged into the sewer system. The Bureau of Environmental Regulation and Management of the Department of Public Works must be notified of projects necessitating dewatering. That office may require water analysis before discharge. Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the report would contain a determination as to whether or not a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring.

Groundwater observation wells would be installed to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during dewatering, groundwater recharge would be used to halt this settlement. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsor.

No further analysis of water resources is required in the EIR.

²⁸ Treadwell and Rollo, 2000.

11) <u>Energy/Natural Resources</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	_____	<u>X</u>	<u>X</u>
(b) Have a substantial effect on the potential use, extraction, or depletion of a natural resource?	_____	<u>X</u>	_____

The project would meet current state and local codes concerning energy consumption. It would not cause a wasteful use of energy. This topic, energy consumption impacts, requires no further analysis and will not be discussed in the EIR.

12) <u>Hazards</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?	_____	<u>X</u>	<u>X</u>
(b) Interfere with emergency response plans or emergency evacuation plans?	_____	<u>X</u>	_____
(c) Create a potentially substantial fire hazard?	_____	<u>X</u>	_____

An environmental profile and a Phase I Environmental Site Assessment of the existing conditions of the project site were conducted and are summarized here.²⁹ As early as 1881, and until approximately 1908, when the existing building on the site was occupied by retail and office uses, the site was occupied by a structure that housed the Palace Varieties Theatre, offices, and a lodging house. The project site is not associated with historical land uses that could have resulted in subsurface contamination of soil or groundwater. The Phase I found that there are no underground or above-ground storage tanks or other forms of potential contamination on or off the site that could be potentially hazardous to the project site. The project site is not within the "Maher Ordinance" area (largely the part of San Francisco created by landfill along San Francisco's historic northeast, east, and southeast shoreline) that is governed by Article 20 of the San Francisco Public Works Code, and therefore no analysis of site soil for hazardous wastes is required pursuant to that ordinance. The project includes a mitigation measure to avoid exposure to hazardous materials by workers and others (see Mitigation Measure No. 3a, p. 33).

²⁹ Camtech, Inc. *Asset Valuation: Structural Engineering Analysis, Cursory Environmental Profile, 185 Post Street, San Francisco, CA*, prepared for IP USA Corp., March 20, 1997. Vertex Engineering Services, *Phase I Environmental Site Assessment, 185 Post Street, San Francisco, California*, prepared for North Tower Environmental and Brand + Allen Architects, September 5, 2000. These reports are on file at the San Francisco Planning Department, 1660 Mission Street, San Francisco, Project File No. 2000.272E.

Hazardous Building Materials

Asbestos-containing building materials have been identified within the existing 185 Post Street building. They include sheet-good flooring, pipe insulation, roofing material, air duct sealant, plaster, window glazing, and ceiling tile. The Bay Area Air Quality Management District (BAAQMD) is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition. Notification includes the names, addresses and phone numbers of operations and persons responsible, including the contractor; description and location of the structure to be renovated/demolished including size, age and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects removal operations. In addition, the BAAQMD inspects any removal operations for which a complaint has been received.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in 8 CCR 1529 and 8 CCR 341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos-containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the properties where abatement would occur must have a Hazardous Waste Generator Number assigned by, and registered with, the California Department of Health Services in Sacramento. The contractor and the hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of the material. Pursuant to California law, the Department of Building Inspection would not issue the required permit until the applicant has complied with the notice requirements above.

These regulations and procedures, already established as part of the permit review process, would ensure that any potential impacts due to asbestos would be reduced to a level of insignificance. Therefore, no further mitigation is required.

Lead paint is also extant in the building. Construction and renovation activities must comply with Chapter 36 of the San Francisco Building Code, Work Practices for Exterior Lead-Based Paint. Where there is any work that may disturb or remove lead paint on the exterior of any building built prior to December 31, 1978, Chapter 36 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Chapter 36 applies to buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces), where more than ten total square feet of lead-based paint would be disturbed or removed. The ordinance contains performance standards, including establishment of containment barriers that are at least as effective at protecting human health and the environment as those in the most recent *Guidelines for Evaluation and Control of Lead-Based*

Paint Hazards promulgated by the U.S. Department of Housing and Urban Development. The ordinance also identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The ordinance includes notification requirements, contents of notice, and requirements for signs. Notification includes notifying bidders for the work of any paint-inspection reports verifying the presence or absence of lead-based paint in the regulated area of the proposed project. Prior to commencement of work, the responsible party (owner or contractor) must provide written notice to the Director of Building Inspection of the location of the project; the nature and approximate square footage of the painted surface being disturbed and/or removed; anticipated job start and completion dates for the work; whether the responsible party has reason to know or presume that lead-based paint is present; whether the building is residential or non-residential, owner-occupied or rental property; the approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. (Further notice requirements include Sign When Containment is Required, Notice by Landlord, Required Notice to Tenants, Availability of Pamphlet related to protection from lead in the home, Notice by Contractor, Early Commencement of Work [by Owner, Requested by Tenant], and Notice of Lead Contaminated Dust or Soil, if applicable.) The ordinance contains provisions regarding inspection and sampling, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

These regulations and procedures required as part of the San Francisco Building Code would ensure that potential impacts due to lead-based paint would be reduced to a level of insignificance. Therefore, no further mitigation is required.

Other potential hazardous building materials such as PCB-containing electrical equipment or fluorescent lights could pose health threats for demolition workers but would be mitigated by abatement as necessary. Mitigation is included in the project to reduce impacts of hazardous building materials (see Mitigation Measure No. 3b, p. 33).

Fire Safety

The City of San Francisco ensures fire safety primarily through provisions of the Building Code and Fire Code. The final building plans for any new or modified retail building project are reviewed by the San Francisco Fire Department, as well as the Department of Building Inspection, to ensure conformance with these provisions. The proposed project would conform to these standards, which would include sprinkler systems throughout the building. In this way, potential fire hazards, including those associated with hydrant water pressure and emergency access, would be mitigated during the permit review process. Therefore, these issues would not result in a significant effect and will not be analyzed further in the EIR.

All potential health and safety issues related to building contamination and soil contamination and remediation would be reduced to a level of insignificance by mitigation measures included in the project (and identified herein as Mitigation Measure No. 3 on p. 33), or would be regulated by current laws and regulations; hence, these issues do not require further analysis and will not be discussed in the EIR.

13) <u>Cultural</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study?	_____	<u>X</u>	<u>X</u>
(b) Conflict with established recreational, educational, religious or scientific uses of the area?	_____	<u>X</u>	_____
(c) Conflict with the preservation of buildings subject to the provisions of Article 10 or Article 11 of the City Planning Code?	<u>To be Determined</u>		

Archaeological Resources

The proposed project would involve excavation (approximately 870 cubic yards) for a sub-basement and as part of the underpinning of the adjacent properties. A review of records and literature found no recorded Native American or historic archaeological resources in the project area.³⁰ While there is no specific evidence that cultural artifacts may be located in the soil beneath the project site or in the vicinity, a mitigation measure has been included to address the possible disturbance of such subsurface cultural resources (see Mitigation Measure 4 on p. 53). With implementation of the mitigation measure, the potential to adversely affect subsurface cultural resources would be negligible. This topic requires no further analysis, and will not be discussed in the EIR.

Historic Architectural Resources

The existing 185 Post Street building, constructed in 1908, is a Category V (Unrated not Significant nor Contributory Building) building within the Kearny-Market-Mason-Sutter Conservation District identified in Appendix E of Article 11 of the Planning Code. The building was also rated "D" (Minor or No Importance) by the Foundation for San Francisco's Architectural Heritage. The building is also listed on the Unreinforced Masonry Building list (as 199 Post Street). With implementation of the project, this building would be demolished. Demolition of the 185 Post Street building would be a less-than-significant impact and does not require further discussion in the EIR. As a new structure within the

³⁰ A records search was conducted by the California Historical Resources Information System, a service of the Northwest Information Center at Sonoma State University. A copy of the letter reporting the results of the search and the literature that was reviewed is on file at the San Francisco Planning Department, 1660 Mission Street, San Francisco, Project File No. 00.272E.

Kearny-Market-Mason-Sutter Conservation District, the proposed project would be subject to the guidelines set forth in Section 7 of Article 11, Appendix E. The project's potential effects on historic architectural resources, as it pertains to the Kearny-Market-Mason-Sutter Conservation District, will be discussed in the EIR. It should be noted that in response to the Planning Department's evaluation of the project for its compatibility with the Conservation District's guidelines, the building design may undergo further refinement.

C. OTHER

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
Require approval and/or permits from City Departments other than the Planning Department, or Department of Building Inspection, or from Regional, State or Federal Agencies?	<u> </u>	<u> X </u>	<u> X </u>

D. MITIGATION MEASURES

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Discussed</u>
1) Could the project have significant effects if mitigation measures are not included in the project?	<u> X </u>	<u> </u>	<u> </u>	<u> X </u>
2) Are all mitigation measures necessary to eliminate significant effects included in the project?	<u> </u>	<u> X </u>	<u> </u>	<u> X </u>

The following are mitigation measures related to topics determined to require no further analysis in the EIR. The EIR will contain a mitigation chapter describing these measures, which are proposed as part of the project, and also include other measures which would be, or could be, adopted to reduce significant adverse effects of the project identified in the EIR.

Mitigation Measure No. 1 – Construction Air Quality

The project sponsor would require the contractor(s) to sprinkle the project site with water during demolition, excavation and construction activity; sprinkle unpaved exterior construction areas with water at least twice per day, or as necessary; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during demolition and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose.

Mitigation Measure No. 2 – Geology

Geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsor and contractor would follow the recommendations of the final geotechnical report(s) regarding any excavation and construction for the project. The project

sponsor would ensure that the construction contractor would conduct a pre-construction survey of existing conditions and would monitor adjacent building(s) for damage during construction.

Mitigation Measure No. 3 – Hazards

- a. To ensure that workers and the public are not exposed to any potential hazardous materials that may exist in the soil to be excavated, the construction contractor would ensure that workers who are exposed to soil contact wear rubber gloves. In addition, the contractor would ensure that soil disturbed through grading be contained within the immediate area by means such as washing workers' shoes and washing earthmoving equipment (using recycled water as described in Mitigation Measure No. 1) prior to workers and equipment leaving the area where grading occurs. Other dust control measures included in Mitigation Measure No. 1 would also serve to prevent the dispersion of potentially contaminated soil.
- b. The project sponsor would ensure that building surveys for PCB-containing equipment (including elevator equipment), hydraulic oils, fluorescent lights, and lead-based paint are performed prior to the start of renovation. Hazardous materials discovered during these surveys would be abated according to federal, State, and local laws and regulations. Asbestos-containing materials would be removed and disposed of or encapsulated prior to renovation and reuse of the building. Interior asbestos-containing materials would be removed as part of the project. All asbestos abatement and encapsulation procedures would be performed in accordance with applicable federal and State guidelines. Equipment identified as containing PCB oils would be removed and properly disposed. Construction and renovation activities that disturb exterior surfaces containing lead-based paint would comply with Chapter 36 of the San Francisco Building Code for the identification, safe work practices, proper removal methods, and notification.

Mitigation Measure No. 4 – Archaeological Resources

Should evidence of archaeological resources of potential significance be found during ground disturbance, the project sponsor would immediately notify the Environmental Review Officer (ERO) and would suspend any excavation which the ERO determined could damage such archaeological resources. Excavation or construction activities which might damage discovered cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the project sponsor would select an archaeologist to assist the Office of Environmental Review in determining the significance of the find. The archaeologist would prepare a draft report containing an assessment of the potential significance of the find and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO would recommend specific additional mitigation measures to be implemented by the project sponsor.

Mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of cultural materials. Finally, the archaeologist would prepare a draft report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report(s) would be sent by the archaeologist directly to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center. Three copies of the final archaeology report(s) shall be submitted to the Office of Environmental Review, accompanied by copies of the transmittals documenting its distribution to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center.

E. ALTERNATIVES

The EIR will analyze alternatives to the project that could reduce or eliminate any significant environmental effects. At a minimum, the No Project Alternative and an alternate design will be considered.

F. MANDATORY FINDINGS OF SIGNIFICANCE

	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
1) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history?	_____	<u>X</u>	_____
2) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	_____	<u>X</u>	_____
3) Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.)	_____	<u>X</u>	_____
4) Would the project cause substantial adverse effects on human beings, either directly or indirectly?	_____	<u>X</u>	_____


The project could affect historic architectural resources, particularly the Kearny-Market-Mason-Sutter Conservation District, and could have a substantial effect on the visual quality of the project vicinity and the Kearny-Market-Mason-Sutter Conservation District. The EIR will analyze these issues.

G. ON THE BASIS OF THIS INITIAL STUDY:

_____ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.

_____ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers _____, in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.

X I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

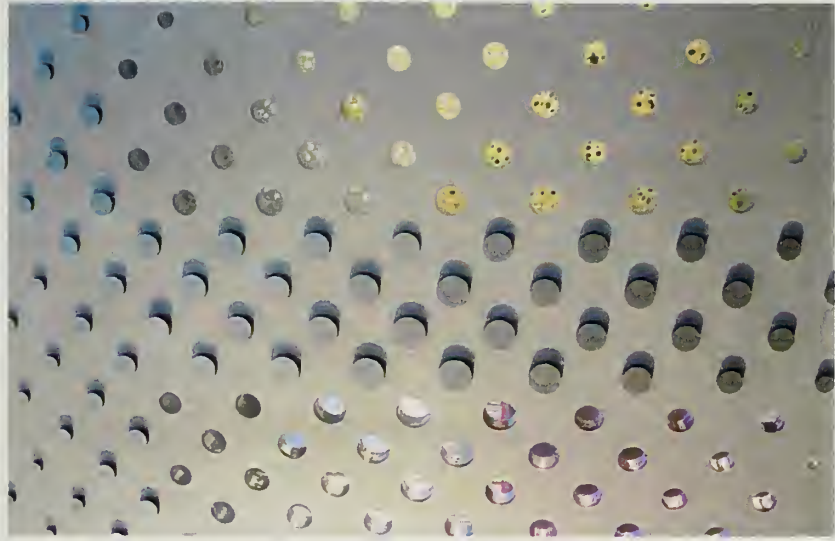
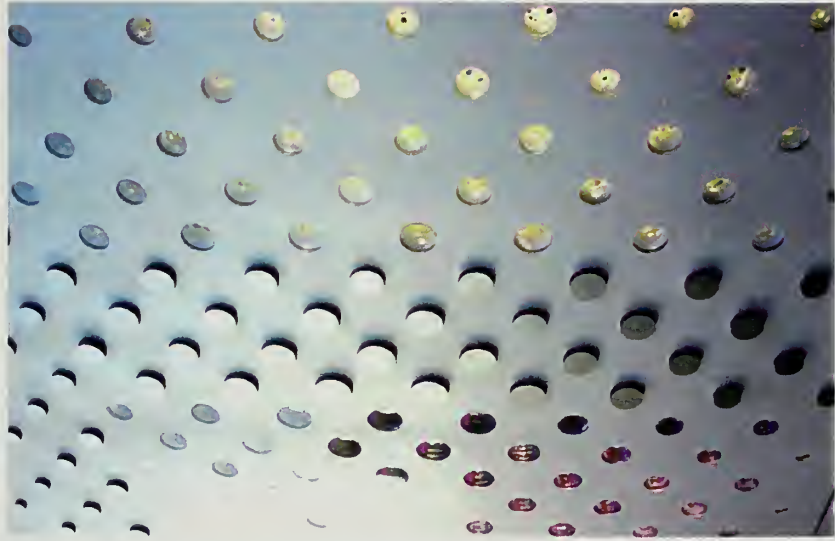
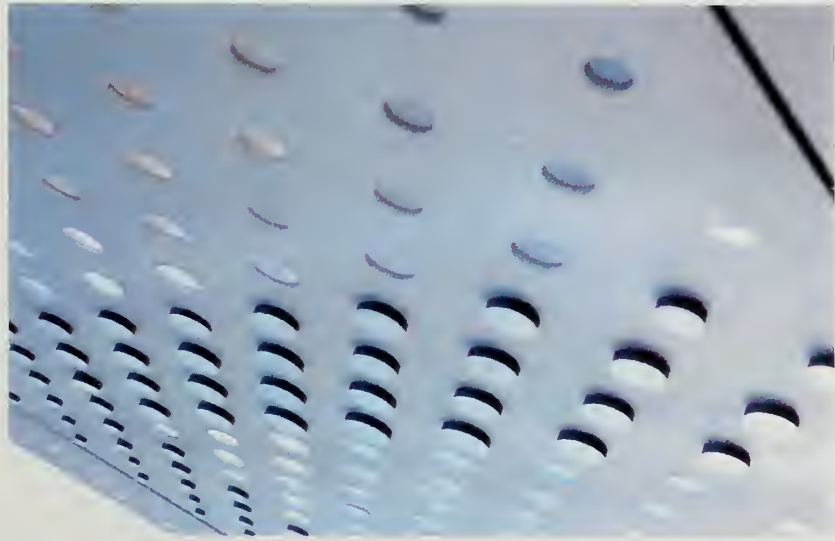

HILLARY E. GITEMAN
Environmental Review Officer
for

GERALD G. GREEN
Director of Planning

DATE: December 21, 2000

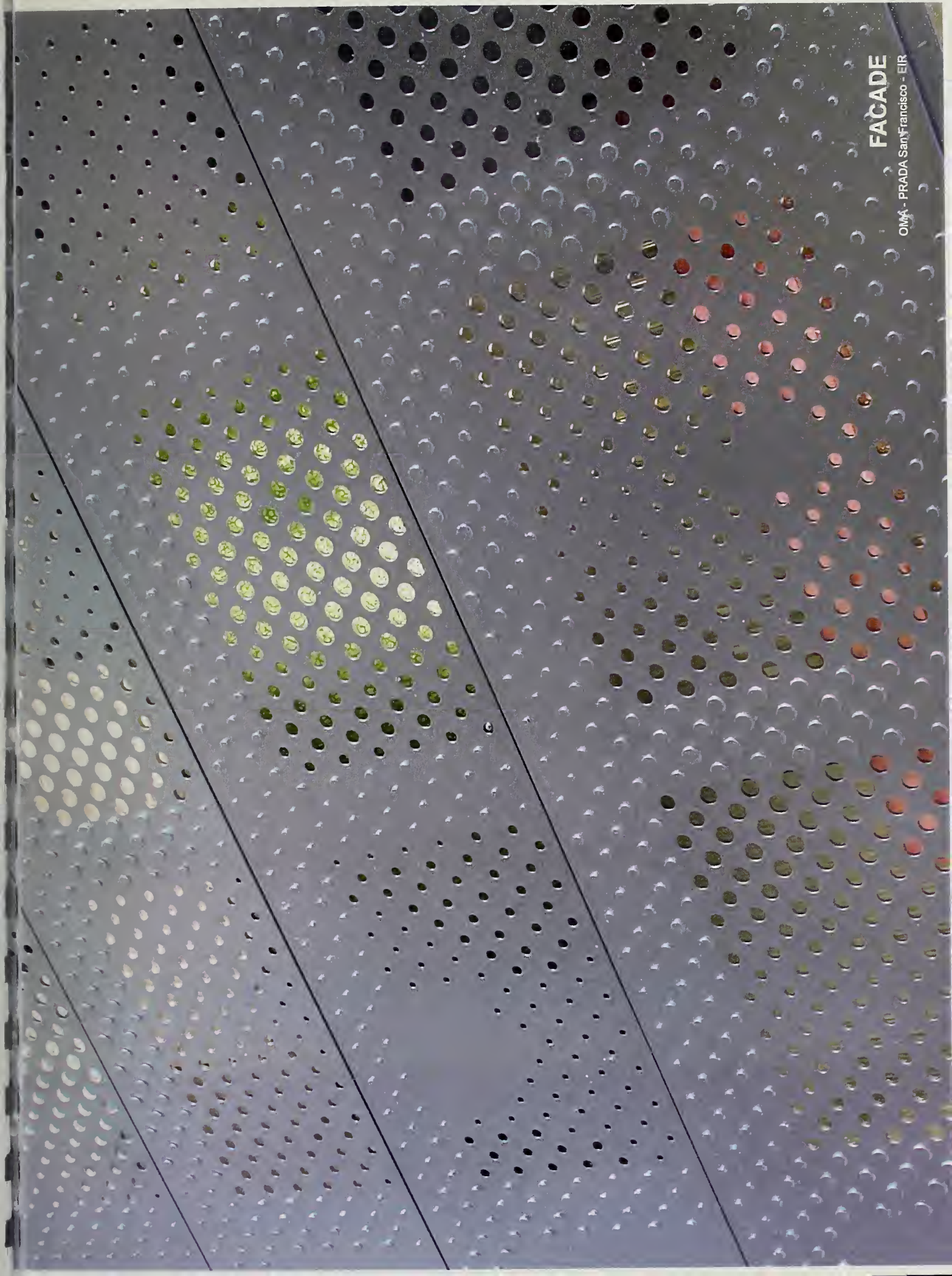
APPENDIX B

BUILDING DESIGN DETAILS



FACADE COLOR AND TRANSPARENCY THROUGHOUT THE DAY

OMA - PRADA San Francisco - EIR



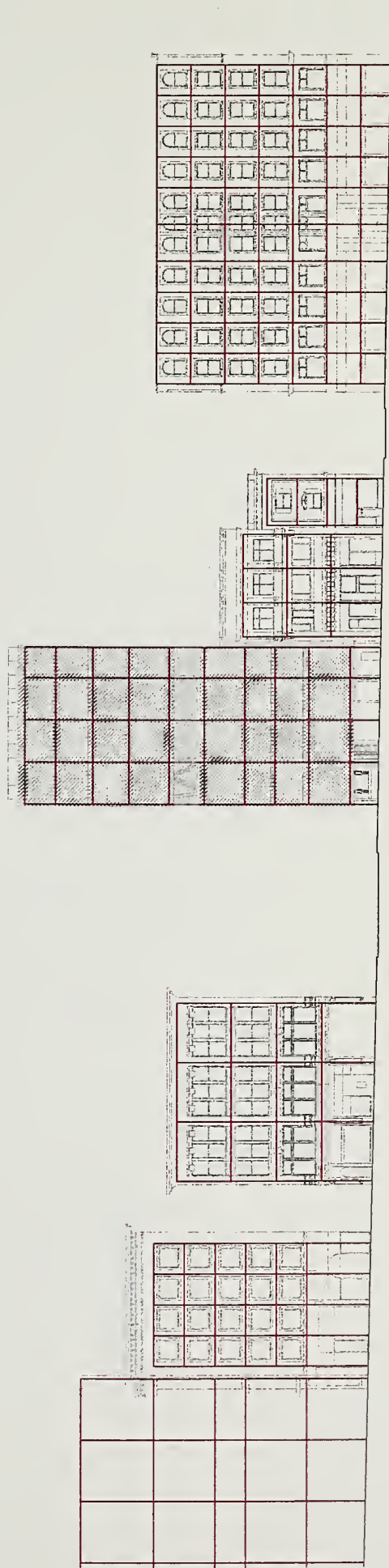
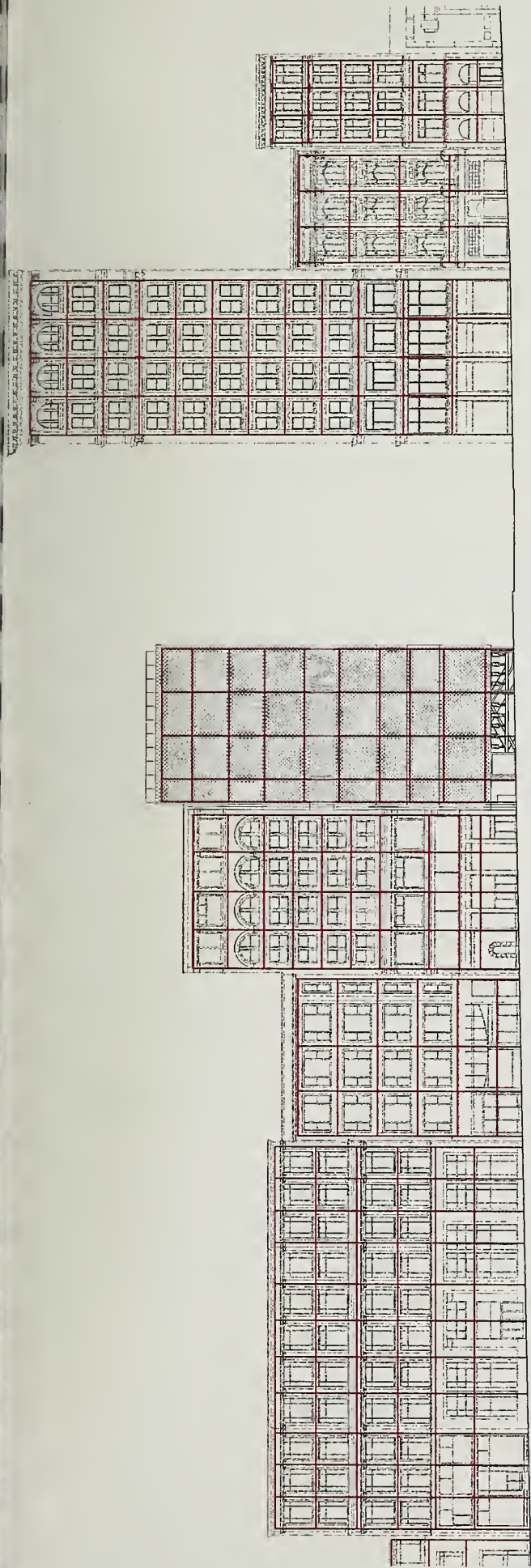
FACADE

OMA - PRADA San Francisco - EIR



APPENDIX C

VERTICAL AND HORIZONTAL RHYTHM COMPARISON



VERTICAL & HORIZONTAL RHYTHM

OMA - PRADA San Francisco - EIR

CHAPTER IX

EIR AUTHORS AND CONSULTANTS

EIR AUTHORS

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Reuben Schwartz

PLACE
POSTAGE
HERE

San Francisco Planning Department
Office of Environmental Review
30 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Attn: Joy Navarrete, EIR Coordinator
00.272E – 185 Post Street Project

PLEASE CUT ALONG DOTTED LINE

RETURN REQUEST REQUIRED FOR FINAL
ENVIRONMENTAL IMPACT REPORT

REQUEST FOR FINAL ENVIRONMENTAL IMPACT REPORT

TO: San Francisco Planning Department,
Office of Environmental Review

Please send me a copy of the Final EIR.

Signed: _____

Print Your Name and Address Below

SAN FRANCISCO PUBLIC LIBRARY



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